

London Plan Examination

London Borough of Bexley (respondent number 2722)

Statement on Matter 19

1. M19. Are the overall 10 year housing target for London and the target for the individual Boroughs and Corporations set out in Policy H1 A and in Table 4.1 justified and deliverable?

- 1.1. The quantum of development required by Table 4.1 of the draft London Plan is not sustainable or deliverable. It has not been prepared with robust evidence, instead being driven by an ill-conceived and wildly optimistic step-change in the development of small sites, which results in unrealistic housing targets set for the boroughs, including a tripling of Bexley's overall current target. It also looks to front load much of the growth into the first 10 years of the plan period whilst many areas across London, including within Bexley, do not yet have committed, or even planned, new sustainable transport infrastructure to support the high-density and mixed-use development needed to meet the housing supply target. This includes transport schemes identified as essential for growth within the draft London Plan itself and specified in Table 10.1 (see also LB Bexley's written statement on Matter 76 regarding transport schemes and development).
- 1.2. Since the first London Plan (2004) and in every version adopted subsequently, borough housing targets have been imposed as an overall target, with no separate targets distinguishing between different sources of housing. The draft London Plan, however, departs from this approach with the introduction of a highly directive and separate target for one element of overall housing capacity: small sites. Although Table 4.1 sets an annual housing target, Table 4.2 and related draft policy H2 require that a substantial component of that capacity must be provided from small sites developments.
- 1.3. The effect is hugely prescriptive, depriving boroughs of the best means to meet their housing targets through an approach more appropriate given local circumstances.
- 1.4. In this context, LB Bexley has submitted robust local and London-wide evidence in support of its written statement regarding small sites (Matter 20), which demonstrates that the targets are undeliverable for a number of reasons, including: that the increase in the number of applications which would need to come forward is highly unlikely to be precipitated by the policy shift; that a review of the GLA's own viability report shows that small sites are unviable in huge swathes of outer London, including within most of Bexley;

and that the methodology which produced the targets is unjustified because it is based not on trends but rather on a tenuous ambition.

1.5. The imposition of a London-wide approach, set out in Paragraphs 4.1.1 to 4.1.4, without regard to local character, infrastructure and markets is doomed to failure and will inevitably make matters worse.

1.6. A less prescriptive plan would allow local authorities to meet objectively assessed need through an approach which is more appropriate given local circumstances. The Bexley Growth Strategy, for example, provides a realistic, sustainable and deliverable local alternative to the vision in the draft London Plan. Furthermore, the adopted Growth Strategy was developed in collaboration with the GLA and the current Mayor – it therefore provides a robustly evidenced approach to delivering a significant amount of development supported by essential infrastructure, including the public transport improvements the borough has lacked for so long.

2. c) Policy H1 B 2) a)-f) identifies various sources of capacity. Will these be sufficient to meet the ten years targets and what proportion of housing is expected to be delivered by means of the different types? How much is expected to be delivered on existing industrial land in the context of Policies E4-E7?

2.1. The sources of capacity identified in draft policy H1 B 2) a)-f) are insufficient to meet the overall targets set out in Table 4.1 in the context of the associated policies in the draft London Plan. This is of particular concern to small sites and industrial land.

2.2. The main issue with regard to source H1 B 2) e) small housing sites, and associated draft policy H2, is deliverability, as demonstrated in detail and with strong evidential support in LB Bexley's written statement regarding Matter 20. Importantly, small sites are not actually identified using the same process as large sites, but rather the Strategic Housing Land Availability Assessment (SHLAA) makes an unrealistic assumption about the number of units which could be provided through developments of 25 units or fewer on sites which are 0.25ha or smaller. In the consultation version of the draft London Plan, those involved in planning were directed to "identify and allocate a range of sites, including small sites" by draft policy GG4 D, but this reference to small sites was removed in the revised version released in July 2018. This highlights the fact that small sites are not actually identified, unlike the other sources of capacity (approvals; allocations; and potential sites).

2.3. The identification of industrial sites as a main source of housing, as set out in H1 B 2) f), highlights a major contradiction between the need and the ability of industrial land to provide a source of housing and the drastically prescriptive approach to industrial land set out in Chapter 6.

2.4. The Council's case in this regard is set out in its statement on matter 62 regarding land for industry, logistics and services. Employment sites are a significant source of potential housing in Bexley, under the approach set out in the Growth Strategy. The development of some industrial sites for residential use and co-located uses is the basis of discussion with the GLA in the development of the emerging Opportunity Area Planning Frameworks (OAPFs) for Thamesmead and Abbey Wood and Bexley Riverside. Balancing competing demands by co-locating and integrating different uses within buildings, sites and neighbourhoods will be extremely challenging, as will be the methodology for securing no net loss overall, especially given the nature of existing industrial activities. In Bexley, the role of retained employment land is likely to continue to focus on waste and warehousing and distribution with limited scope for sector shift unless there is a significant uplift in accessible transport connectivity. No examples have been provided of satisfactory typologies that effectively integrate these uses vertically without affecting quality and amenity. It is doubtful whether a truly satisfactory solution can be found without compromising the residential element. In this context, densification of remaining employment areas is considered to hold significant potential thereby allowing release in the best-connected locations.

3. Should the target be for longer than 10 years given that the plan period runs to 2041?

3.1. Yes it should. The imposition of ten-year targets in a 20-year Plan is incongruous. The July 2018 suggested minor modifications to the draft plan addressed the issue in new paragraph 4.1.8A with an instruction to develop a target by drawing upon the 2017 SHLAA to roll forward housing capacity assumptions, with modifications to account for any additional capacity as a result of committed transport improvements.

3.2. However, the use of ten-year targets raises a more fundamental issue regarding the deliverability of the Plan and the relationship between land use and transport planning. The draft Plan's approach to growth is incongruous because it frontloads growth to the first ten years of the plan, yet the transport infrastructure required to support growth is proposed to be delivered later in, or even beyond the plan period. The list of indicative transport schemes set out in Table 10.1 shows that the majority of transport projects identified as being integral to supporting development will not in fact be delivered until the

latter part of the plan period. This interrelationship should be reflected in the phasing of the housing target in the draft plan.

3.3. Sustainable development is only deliverable where there is a strong degree of certainty that future infrastructure will be provided. This is the approach set out in the Bexley Growth Strategy, which seeks a phased approach to development across areas to align with infrastructure delivery and the necessity for development sites to transition from low to high connectivity through their lifetime via mechanisms such as parking management plans. Bexley has first-hand knowledge of the relationship between infrastructure and growth in outer London, including the development of the business case for the Eastward extension of the Elizabeth Line as a founding member of the C2E Partnership – an element of transport infrastructure that is considered essential to the unlocking of housing delivery in the borough's opportunity areas.

4. j) How and where is the shortfall between the identified need of 66,000 additional homes a year and the total annualised average target of 64,935 to be made up? Will LPAs outside London in the wider south east be expected to deal with this on an ad hoc basis and is this realistic?

4.1. The draft London Plan appears to have an annualised shortfall of 1,065 homes. The London-wide Strategic Housing Market Assessment (SHMA) has identified need for 66,000 additional homes per year, whilst the Strategic Housing Land Availability Assessment (SHLAA) has ostensibly identified capacity for 64,935 units.

4.2. The reality is that the shortfall between objectively assessed need and capacity will be significantly greater than 1,065 because much of the small sites component of the target is unlikely to be delivered. The targets for small housing development in Table 4.2 are unjustified and undeliverable. These arguments are set out in full in the Council's written statement regarding small sites (Matter 20), which demonstrates that the targets are unlikely to be achieved for a number of reasons, including that: the increase in the number of applications which would need to come forward is highly unlikely to be precipitated by the policy shift; that a review of the GLA's own viability report shows that small sites are unviable in huge swathes of outer London, including within most of Bexley; and that the methodology which produced the targets is unjustified because it is based not on trends but rather on an ambition.

- 4.3. With a realistic estimate of small sites capacity, the draft London Plan would have failed to identify the objectively assessed need for housing in the capital, as required by the National Planning Policy Framework (NPPF).
- 4.4. The draft London Plan implies that London's housing need will be met fully within the boundaries of the capital. Draft policy H1 D suggests that London boroughs "should work with the Mayor to resolve any anticipated shortfalls" where those boroughs' housing trajectories do not appear sufficient to meet their annual housing targets. However, LB Bexley believes that to try and continue to meet London's need within its boundaries will ultimately prove unsustainable and that the endorsement of discussions with authorities outside the capital, through mechanisms such as the duty to cooperate, would be appropriate. This would provide an opportunity to start, or encourage the continuation of existing, discussions to explore local solutions, recognising the existing interdependencies across borders and the shared regeneration and economic development opportunities that exist, particularly along key strategic transport corridors.