



Strategic Planning & Research Unit

For and on behalf of
London Councils

**Draft London Plan
Response to Panel Matter, M19
Housing Supply and Targets - M19**

**Prepared by
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CONTENTS	PAGE
1.0 Introduction.....	4
2.0 Matter 19 – Are the overall 10 year housing targets 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?	5
a) Are the assumptions and analysis regarding site suitability, availability and achievability and development capacity for large sites in the SHLAA reasonable and realistic?	5
b) Have the environmental and social implications of the proposed increase in housing targets been fully and properly assessed?	8
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 to E7? 10	10
d) Will the focus on existing built up areas rather than urban extensions using GB/MOL provide sufficient variety of house types and tenure?.....	11
e) Is the emphasis on development in Outer London consistent with the intention of Policy GG2 that seeks to proactively explore the potential to intensify the use of land on well-connected sites?.....	11
f) Does the Plan adequately consider the cumulative impacts of other policies on the deliverability and viability of housing?.....	11
g) What is going to bring about the step change in the delivery implied in the Plan compared to the current one? What are the tools at the disposal of Boroughs in 1.4.6? Is it realistic to expect this to occur from 2019 or should there be a stepped or transitional arrangement?	11
h) Should table 4.1 include targets for different types and tenures of housing?	12
i) Should the target be for longer than 10 years given that the plan period runs to 2041?	13
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?	13
k) Does paragraph 4.1.8A adequately explain how Boroughs are to calculate a target beyond 2028/29?	14
l) What will be the implications for London Boroughs if the Plan targets are adopted which increase the requirement in recent development plans?	15

1.0 INTRODUCTION

- 1.1 This Hearing Statement has been prepared by the Strategic Planning Research Unit ('SPRU') of DLP Planning Ltd on behalf of our client, London Councils.
- 1.2 London Councils represents London's 32 boroughs and the City of London. They are a cross-party organisation that works on behalf of all of its member authorities regardless of political persuasion.
- 1.3 Representations at previous stages of the London Plan development have been submitted under representor number 2601.
- 1.4 The draft London Plan should be consistent with national policy, this is set out in the National Planning Policy Framework (Framework) and Planning Practice Guidance (PPG). Guidance in the Framework and PPG refers in general to Local Plans, however as approached by previous inspectors to the London Plan, and confirmed by the Panel, we have considered the in context of paragraph 182 of the Framework. It is in this context we make reference to matters of soundness in these representations.

2.0 MATTER 19 – ARE THE OVERALL 10 YEAR HOUSING TARGETS FOR LONDON AND THE TARGET FOR THE INDIVIDUAL BOROUGH AND CORPORATIONS SET OUT IN POLICY H1 A AND IN TABLE 4.1 JUSTIFIED AND DELIVERABLE?

a) Are the assumptions and analysis regarding site suitability, availability and achievability and development capacity for large sites in the SHLAA reasonable and realistic?

2.1 London Councils have significant concerns with the approach taken in the SHLAA, we do not consider the SHLAA, regarding the assessment of certain sites, has been undertaken in accordance with relevant national policy or guidance.

2.2 The biggest issue of concern is the process of assessment given to those sites which are identified as 'other large sites' as defined in paragraph 2.1, bullet point 3 of the SHLAA (NLP/HOU/002). These sites are identified using a constraints model.

This establishes probability based housing capacity estimates for each site based on the number and severity of planning policy, environmental and delivery constraints affecting it

2.3 Further to this, paragraph 2.4 states the individual sites are confidential. Paragraph 2.5 goes on to state that the SHLAA uses the assessment of overall capacity on potential sites to provide an aggregate, probability based estimate of future contribution from this source at a local planning authority level and is not a capacity assessment of individual sites.

2.4 From the description of 'other large sites' and subsequent paragraphs the key phrases which are used to describe the process are: *probability based, estimates and aggregate*.

2.5 The 2012 Framework, paragraph 159, bullet point 2, states:

Prepare a SHLAA to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

2.6 This is to ensure that local planning authorities should have a clear understanding of housing needs in their area. The assessment carried out in the dLP SHLAA, on 'other large sites' is based upon probability and estimates and not realistic assumptions. London Councils considers that this is a fundamental difference between the approach in the SHLAA and what is set out in national policy. The 'bar' of probability is based upon

a series of questions, based upon data sets and not based upon professional judgement or the consideration of the relevant national policy or local characteristics of a site. Therefore to pass the threshold of 'probability' is fundamentally different to establishing a realistic assumption (and therefore capacity) of a site.

2.7 The consequence of this is clear, without having a housing requirement based upon a realistic assumption of the capacity of their plan making area, the London boroughs or corporations when they begin their next round of plan making could fall significantly short of meeting the requirement. The consequences of this are outline in responses set out below.

2.8 Throughout section 2 of the SHLAA the approach to each of the different constraints layers across London, such as; environmental, land ownership and policy, is set out and a probability scoring is given. We have not provided detailed commentary on each constraint type and have instead focussed upon 1, to use as an example.

2.9 The environmental constraint of flood risk is set in paragraph 2.60 onwards and in table 2.14 on page 34. Paragraph 2.60 states that:

These [environmental] constraints are considered to have the potential to impact the probability of large sites coming forwards for housing so, where these are identified, this impacts the probability assumed and constrained housing capacity estimates for a site.

2.10 Turning to table 2.14, the impact on probability is given, should a site be located within the various flood zones (from 2 through to 3b). Firstly there is no explanation why 5% and 10% reductions in probability are given to flood zone 3a with defence and 3a without defence, there is no rationale behind that impact.

2.11 Secondly there is no impact on probability if a site is within Flood Zone 2. This approach does not appear to be in accordance with national policy. Paragraph 100 of the 2012 Framework states:

Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage and residual risk taking account of the impacts of climate change.

2.12 The approach taken in the SHLAA is clearly not a risk-based approach to flood risk, it is a probability (but not even of flood risk) of the constraint impacting upon development.

2.13 Paragraphs 101 to 103 go on to set out in what circumstances development is

appropriate in Flood Zone 2 (through a sequential assessment) or Flood Zone 3a (through an exceptions test) it is clear that until either of these assessments have been adequately applied then development in either zone should not be allocated.

- 2.14 Therefore, it is London Councils view that in this example, the SHLAA should at least clearly set out what the genuine realistic capacity of each borough or corporation could have been achieved outside of flood zones 2 and 3. This is one of many factors which could influence a 'reasonable alternative' to policy H1 which we set out in more detail in response to question (b).
- 2.15 Table 2.15 then goes on to set out potential options to overcome environmental constraints, for flood risks various hard mitigation measures are suggested. It is not clear what this table is for or how these mitigation measures have influenced probability scoring.
- 2.16 Paragraph 2.68 states it has considered national policy but it clearly has not, as set out above. Paragraph 2.69 states that residential development in Flood Zone is compatible, however it fails to acknowledge national policy which states that such circumstances should be avoided. The paragraph does recognise the SHLAA is not an allocations exercise, but this typifies our concern; housing requirements have been prepared which will be scrutinised in further detail through the plan making process of boroughs and corporations and are therefore likely to reduce. Flood Risk issues are particularly important when allocating sites.
- 2.17 Another wider issue of flood risk, which should be tackled through the evidence base of a strategic plan, is if individual SFRA are prepared for each borough or corporation Local Plan, this could lead to areas allocating housing in flood zone 2 or 3a, when in other boroughs there is further development capacity in flood zone 1. It is not possible to ascertain how issues such as this, that should be addressed through the evidence base to formulate Policy H1, will be adequately resolved once the London Plan is adopted. How can the housing requirement distribution across London seek to avoid or minimise flood risk?
- 2.18 Paragraph 2.11 of the SHLAA states that 'on aggregate' the approach of the SHLAA is robust, then three advantages are listed. If there has been a balancing exercise as to the pros and cons of the approach (which is inferred by referring to 'on aggregate') then some of the disadvantages to the approach should have been clearly identified.

- 2.19 As set out in previous representations London Councils have been informed by the Outer London Boroughs that they have a significant level of concern that they were not fully consulted on the outputs from the SHLAA (Table 4.1) were arrived at and the lack of transparency in the process.
- 2.20 Table 4.5 of the SHLAA should be broken down by borough and corporations so that the scale of new allocations / permissions / opportunity areas can be clearly quantified and the scale of change, to that which is already permitted or allocated is clearly known for plan makers and the general public. Figure 4.11 attempts this, but it is not a clear graphical representation. This information should be clearer and it should be in the dLP. It should also be split between phases 1, 2, 3 and partial 4.
- b) Have the environmental and social implications of the proposed increase in housing targets been fully and properly assessed?**
- 2.21 The Integrated Impact Assessment (IIA) of the draft New London Plan, which contains the Strategic Environmental Assessment (SEA) of the dLP, is set out in documents NLP/CD/04 (IIA) and NLP/CD/05 (IIA addendum).
- 2.22 Policy H1 is assessed in the IIA, at pages 136 to 138. For the purposes of this statement, we have focussed our concerns to objectives 6 and 7 and 9 to 24 of the IIA which fulfil the purpose of SEA. Through our review of the assessment of policy H1, we have identified several areas of concern, which are required as set out in the SEA directive (and SA regulations), the most pertinent to question (b) are as follows:
- a. No realistic alternatives are considered for the key issue of housing targets / distribution across London
 - b. An alternative of 'business as usual' or 'do nothing' has not been included
 - c. The sustainability effects of each alternative are not identified and are not compared
 - d. The characteristics of areas likely to be significantly affected are not described; both within the physical boundary of the dLP nor beyond
- 2.23 The dLP's evidence base has failed to adequately assess the environmental and social implications of the proposed housing targets. There is no comparison between a business as usual approach and the proposed housing requirements on a London wide basis, nor on a more appropriate geography of a borough by borough basis.

- 2.24 The assessment is so 'high level' that meaningful conclusions, to the sustainability effects of policy cannot be adequately identified. For example, objective 6 *'Make the best and most efficient use of land so as to support sustainable patterns and forms of development'* scores a single + for short, medium and long term effects, however it is not at all possible to ascertain how this assessment has been carried out on a London wide basis nor for each borough. The description of the assessment on page 136 seems to assess the interventions which site outside of the plan, rather than the effects of the policy itself.
- 2.25 For several objectives a score of n/a is given which according to the key means *'This is applied to objectives that are clearly not affected by the option or policy being assessed.'* Considering that policy H1 proposes to significantly increase development across London, the effects upon:
- a. Objective 13 - *To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position*
 - b. Objective 15 – which concerns climate change
 - c. Objective 18 – which concerns water supply and drainage
 - d. Objective 19 – which concerns flood risk
 - e. Objective 21 – which concerns heritage assets
- 2.26 It is of great concern to London Councils that these important issues are not considered to be sufficiently important to the assessment of policy H1. It is difficult to understand how these issues will clearly not be affected by the significant increase of housing delivery across London and individual boroughs and corporations.
- 2.27 The IIA/SEA does not explain what reasonable alternatives had been considered and therefore fails to establish why they had been rejected. The requirement to consider alternatives is iterative of the plan making process, failure to do will result in a non-compliant SEA.
- 2.28 For there to be compliance with Article 5 of the SEA Directive, the public must be presented with an accurate picture of what reasonable alternatives there were to the proposed policies and why they were not considered to be the best option.
- 2.29 In an iterative plan-making process, the environmental report accompanying the draft

plan must refer to, summarise or repeat the reasons that were given for rejecting the alternatives at the time when they were ruled out and those reasons must still be valid.

2.30 The IIA does not appear to provide an adequate level of discussion on the characteristics of areas likely to be affected by the implementation of the dLP.

2.31 The information to be provided under Article 5(1), subject to Article 5(2) and (3) of the SEA Directive, is the following:

(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC (conservation of wild birds) and 92/43/EEC (conservation of natural habitats and of wild fauna and flora).

2.32 London Councils consider that the social and environmental implications of an increase in housing delivery have not been considered at all, because of significant failings in the IIA. Without a robust IIA/SEA there is no justification to support policy H1.

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 to E7?

2.33 Policy H1 B 2) a) to f) identifies several sources of potential housing capacity that could need housing requirements. It is not clear the relevance of including this list, when considered there is reference already made to maximising brownfield development making use of brownfield registers etc. Sources a), b), c) d) and f) were supposedly considered through the SHLAA process and therefore these sources have already been considered. Including them again in policy is effectively double counting their potential. Source e) is not a windfall as described by H1 B 1) b) “*encourage development on other windfall sites not identified...*”

2.34 The potential capacity from each source is not clearly set out, therefore there is no evidence to demonstrate there will be clear capacity. It should also be noted, this policy requires optimum housing delivery on all ‘suitable and available sites’ however the SHLAA, as stated in response to question (a) does not adequately consider the suitability and availability of sites, therefore any capacity assessment produced from the SHLAA should be treated with caution.

d) Will the focus on existing built up areas rather than urban extensions using GB/MOL provide sufficient variety of house types and tenure?

2.35 A focus upon existing built up urban areas is likely to lead towards an increase the development of flats to ensure housing requirement figures are met. However, it is likely that the mix of tenures and housing types identified in policies H7 and H12 will not be achieved because new flat development typically is 1-2 bedroom and not a favoured by families. This is another example as to how the transposition of the SHLAA figures should have been considered through a sustainability appraisal and, or, different growth options considered to ensure that other plan policy targets could be achieved.

e) Is the emphasis on development in Outer London consistent with the intention of Policy GG2 that seeks to proactively explore the potential to intensify the use of land on well-connected sites?

2.36 London Councils consider that the outputs of the SHLAA, which have been transposed into table 4.1 have not adequately considered any form of strategic growth option or in this instance the efficient use of land: maximising brownfield sites. Therefore, potentially if the detail behind H1 is set out there could be a conflict between Policy GG2 and H1. There is no evidence to demonstrate that the housing requirements have considered the best use of land, i.e using brownfield sites.

f) Does the Plan adequately consider the cumulative impacts of other policies on the deliverability and viability of housing?

2.37 London Councils relies upon original representations for this question.

g) What is going to bring about the step change in the delivery implied in the Plan compared to the current one? What are the tools at the disposal of Boroughs in 1.4.6? Is it realistic to expect this to occur from 2019 or should there be a stepped or transitional arrangement?

2.38 There are 'tools' that sit outside of the London Plan which could help to increase housing delivery, some of these are listed in the dLP at paragraphs 4.1.3 to 4.1.6 which are contained in the London Housing Strategy, these are supported by London Councils.

2.39 There needs to be clarity as to what the GLA expects boroughs and corporations can do to ensure homes are built once permission is granted (paragraph 1.4.6). These are assumed to be those listed from 4.1.3 to 4.1.6. London Councils recognises the delivery of homes is complex and in practical terms, only begins once permission is granted and

therefore support the London Housing Strategy, but would welcome clarification what else could be done. It is important to establish this now, to ensure delivery is based upon realism.

2.40 A key component to increasing housing delivery which can be brought about through a plan-led system is certainty. With the certainty of targets, development to be brought forward and policies which will be used to determine applications and how subsequent development plans can be prepared. A lack of certainty can present a risk to developers, which in turn could impact upon delivery. A level of certainty through this policy can be achieved, by ensuring housing targets are realistic and the means of delivery are also realistic. London Councils notes that other representations made to the draft London Plan cite concerns with the housing market's ability to deliver the homes identified.

2.41 As a strategic plan making authority, the GLA should be working with the boroughs and corporations to ensure the housing targets are realistic and based upon robust evidence, rather than based solely on high aspirations. As set out in response to question (a and b) London Councils considers that firstly the evidence base informing the housing targets needs to be revisited. Following this, if targets remain at similar levels then a stepped approach would be reasonable. However, whether the housing requirement is 'pushed back' into later years, 'redistributed' across London, or 'redistributed' to the wider south east would need to be considered, depending on the scale and implication to annual targets of a stepped approach.

2.42 London Councils raised a further barrier to increased delivery which is the significant under resourcing of London boroughs. The cumulative impact of the dLP will undoubtedly increase pressure on planning departments. As well as the expected significant increase in planning applications, the approach to design and density is likely to be resource intensive which could prolong the decision making process. The adequate resourcing to effectively deal with the level of planning applications to permit the scale of development envisioned in the dLP has not been considered. London Councils consider that well resourced planning departments should be added as an additional tool, that is fundamental to achieving higher rates of delivery.

h) Should table 4.1 include targets for different types and tenures of housing?

2.43 No, London Councils considers that policies H7 and H12 adequately deals with the need for different types and tenures of housing.

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

2.44 Paragraph 157 of the Framework, bullet point 2, states that Local Plans should:

be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;

The evidence base to support the dLP identifies a level of housing need beyond a 10 year period and it also considers there is sufficient capacity to deliver these new homes. Given the strategic nature of the London Plan the housing requirement should go beyond the short to medium term and seek to tackle longer term strategic planning issues. There is adequate evidence to support a housing target of at least 15 years.

2.45 Using a 10 year requirement is not sound. It is not positively prepared; the strategy has clearly not been prepared to meet known objectively assessed housing needs across London. It is not justified, there is no evidential basis to significantly cut short the length of the housing requirement period, it is not an appropriate strategy when considering available evidence. It is not consistent with national policy, the plan intentionally limits the delivery of sustainable development, firstly by having a shortened requirement period and secondly providing an in-effective process to the Boroughs and Corporations to go beyond a 10 year period when preparing their own Local Plans. This issue is explored more in response to question k).

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?

2.46 London Councils support the objectively assessed need of at least 66,000 additional homes per year. At present this is only referenced in explanatory text to the dLP and not specifically within policy.

2.47 The annualised target of 64,935 is some 1,065 short of the 66,000 additional homes needed each year. Over the 10 year period this equates to 10,650 additional homes needed that will not be delivered. Over a 15 year period this equates to 15,975 dwellings. The failure to recognise this significant shortfall, in a strategic plan for London, will clearly impact upon the lives of many households across London.

2.48 To enable housing need to be effectively delivered, in full, either within the individual

London Borough's or Corporation's Local Plans, or by Local Planning Authorities across the wider south east there needs to be a clear policy statement within the dLP. For plan making authorities in London, this will help to ensure that opportunities to deliver new homes across London are maximised and that there is a policy basis for exceeding, where possible, the capacity driven housing targets set out in table 4.1.

- 2.49 For Local Planning Authorities across the wider south east, this will form a basis, or policy starting point, for the Mayor and Councils in the wider south east to begin dealing with the issue of un-met housing needs arising from London. The particular issue of un-met housing need was considered by the Inspector for the FALP in his report of 2014. At paragraphs 56 to 58 the need to re-consider the FALP was set out, the Inspector concluded that a failure to adopt the FALP, despite his reservations on housing delivery, may actually threaten housing delivery. Clearly the dLP is ambitious and seeks to deliver substantially more housing than previous Plans, there however remains a substantial shortfall of at least 10,650 additional homes not planned for within this 10 year period.
- 2.50 Without adequately establishing this shortfall in the London Plan there is no certainty un-met housing need will ever be delivered either within London or in the wider south east.
- 2.51 Since adoption of the FALP there have been numerous Local Plans prepared, examined and adopted in the wider south east. The issues of un-met housing need arising from London is often raised. However, because the London Plan did not identify a specific un-met need or strategy to deal with an un-met need it is an issue that has remained unanswered and potentially could continue to be so, unless the London Plan adequately address the issue and takes the first important steps, to resolving this issue.
- 2.52 London Councils consider this issue needs to be adequately addressed to ensure individuals and families from across London have the opportunity to be properly housed.
- k) Does paragraph 4.1.8A adequately explain how Boroughs are to calculate a target beyond 2028/29?**
- 2.53 In line with our comments made to question (i) the period should be beyond 2029/30.
- 2.54 In line with our comments made to question (a and b) this bi-lateral approach between the GLA and individual boroughs or corporations will fail to consider wider strategic planning matters and whether other Local Plans in preparation are able to exceed their housing targets.
- 2.55 The approach is based upon a premise of if a target is needed beyond 2028/29, it gives

no consideration to the requirement that the boroughs and corporations will need to conform with national policy, set out in the 2018 Framework, which ideally requires a 15 year plan. Furthermore, there does not appear to be any consideration of when the individual boroughs and corporations will be next preparing their Local Plans, this is information available within Local Development Schemes. It is highly likely that those which start the process shortly will need a target that goes beyond 2028/29. Therefore, London Councils consider this paragraph should be deleted and in line with comment made to question (a) that the time period table 4.1 is extended to 15 years. This will provide a reasonable level of clarity to all plan making bodies when preparing their next Local Plans as to what the medium to long term housing needs of London are.

I) What will be the implications for London Boroughs if the Plan targets are adopted which increase the requirement in recent development plans?

- 2.56 One potential implication is that requirements set out in adopted development plans across London will be superseded by those contained in the London Plan and will be out of date. That will present those plan making authorities with the
- 2.57 Second to this, is that there is likely to be an increase in applications determined through applying the 'tilted balance' to decisions made either by planning committee or through appeal. Whilst this would potentially increase the number of homes delivered, it would not necessarily deliver them in the most cumulatively sustainable way when considered from a strategic point of view, from a wider London perspective or within each plan making area.
- 2.58 Furthermore a range of policies set out in the dLP, will effectively become decision making style policies for each planning authority to use when determining applications. These policies will also supersede any local policy covering similar issues. There is also the potential to create conflict and confusion in the decision making process. These policies have very little consideration for distinct characteristics, designations etc at a local level and apply a high-level presumption.
- 2.59 As we set out in response to question (j) London Councils considers that certainty to developers is important and that the potential increase of speculative development could jeopardise the delivery of sites which have already been granted planning permission or allocated in development plans. Those which are likely to be jeopardised are those which have taken, or are likely to require, years to deliver acceptable planning solutions or those in need of external funding to resolve high cost constraints of various types, such



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as; landownership, contamination, flood risk etc. Such schemes are often delicately balanced and an unexpected changes to the market (competition on customers and also on price) could delay delivery.

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