

DRAFT NEW LONDON PLAN – EXAMINATION IN PUBLIC

Statement on Matter M19

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Housing supply and targets

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?

In particular:

- a) **Are the assumptions and analysis regarding site suitability, availability and achievability and development capacity in the Strategic Housing and Employment Land Availability Assessment reasonable and realistic?**
- b) **Have the environmental and social implications of the proposed increase in housing targets been fully and properly assessed?**
- 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?**
- d) **Will the focus on existing built up areas rather than urban extensions using GB/MOL provide sufficient variety of house types and tenure?**
- e) **Is the emphasis on development in outer London consistent with the intention in Policy GG2 that seeks to proactively explore the potential to intensify the use of land on well-connected sites?**
- f) **Does the Plan adequately consider the cumulative impacts of other policies on the deliverability and viability of housing?**
- g) **What is going to bring about the step change in 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?**
- h) **Should Table 4.1 include targets 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?**
- 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?**
- k) **Does paragraph 4.1.8A adequately explain how Boroughs are to calculate a target beyond 2028/29?**
- l) **What will be the implications for London Boroughs if the Plan targets are adopted which increase the requirement in recent development plans?**

The housing targets are justified, but their deliverability is in doubt due to the reasons given in our statement for M9, M17 and M18.

M19 a) The 'achievability' of the right type of housing on the land identified will be too dependent on the proposals of the big five developers and their profit aims which make it uncertain. The Letwin review concluded that the fundamental driver of build-out rates, once detailed planning permission is granted for large sites, appears to be the 'absorption rate' - the rate at which newly-constructed homes can be sold into the local market without materially disturbing the market price.

M19 b) The environmental and social implications of the increased housing targets will depend upon the ability of boroughs to plan well for each identified site to achieve the requirements set out in the good growth policies.

M19 c) The various sources of capacity mentioned in Policy H1 B 2) (a-f) have uncertain timescales for housing delivery due to the need to achieve cooperation and agreement from the current land users. Whilst some will come forward as allocated sites, most will be "windfall" sites, not all of which will have been included in the SHLAA/capacity exercise. However, the borough housing targets will have been informed by the SHLAA, but whether this approach will produce a 10-year supply is too difficult to forecast, especially if small sites are a major element of the target.

The amount that is likely to be delivered by co-locating housing and employment uses on industrial land is very uncertain, in that it will depend on the flexibility of developers and the accessibility of the housing to local services, amenities, social infrastructure and public transport of suitable accessibility and capacity.

Their affordable housing need has increased continually due to the low delivery rate of such homes for many years, as in the Mayor's Annual Monitoring Report in which KP5 target is "Completion of 17,000 net additional affordable homes per year" but the achievement even as recent as 2016 was 7,300. AMR paragraph 2.20 states "Between 2014/15 and 2016/17 affordable housing output averaged 21% of total provision." The 2017 SHMA puts that need at 65% of all new homes. This large gap needs examination for its reasons and for the policies that will increase affordable housing provision.

M19 d) The variety of housing types and tenures are uncertain due to a heavy dependency on the large house builders to deliver the mixed-use development that is possible. Nevertheless, housebuilders will need to consider the needs of wider range of household types, including older people, students and single or sharing younger people. London boroughs will need to develop positive policies to meet these needs.

Urban extensions into Green Belt and MOL, however, may not be an option.

M19 e) With regard to intensification of land use in Outer London, paragraph 1.2.5 states that "New and enhanced transport links will play an important role in allowing this to happen." Unless improved public transport is delivered in Outer London, development potential will be limited because Policy GG2 places emphasis on "sites which are well-connected by existing or planned Tube and

rail stations.” Also “higher density development, particularly on sites that are well-connected by public transport, walking and cycling to other infrastructure and services, applying a design-led approach.”

The shortfall in the budget of Transport for London for transport improvements is not encouraging. Major projects, such as Crossrail2, are still uncertain and at least 15-20 years away. These could transform parts of north-east and south-west London by adding significantly to housing capacity.

M19 f) - no comment

M19 g) Opportunity Areas, redevelopment around town centres and Policy H2 for small sites could produce the step change in housing delivery necessary to meet the NLP targets. However,

- Paragraph 1.4.5 states that “vacant plots are now scarce, and the scale and complexity of large former industrial sites makes delivery slow.”
- The Letwin report on build-out rates offers few solutions to the problem of housebuilders releasing new homes only at a rate which suits them.
- Design review and viability testing may delay some applications or deter developers.
- Bringing empty homes into use as affordable housing (paragraph 1.4.6) will not happen quickly.

M19 h) The quantities of the main types and tenures of housing required may be forecast at the London level, but are likely to be better understood by boroughs and included in their Local Plan, rather than attempt to provide borough level figures in Table 4.1. There is still not enough information at the London level to distribute targets to boroughs, however, where there is local evidence of the needs of different types of households, for older people, students and shared living schemes, local assessments might be more appropriate.

M19 i) The ten-year period is suitable, given that SLAA and SHMA calculations will occur every four or five years and drive change to new London Plan targets and policies. Indeed, there is little point in any longer time period as the strategy and policies will be monitored, reviewed and changed within 5 years.

M19 j) The shortfall in the total number of new homes annually could be made up from windfall sites and by a review of how Opportunity Areas could be intensified in their development. Unfortunately, most of them do not have a Local Plan, except Old Oak and Euston. This must be addressed.

M19 k) - Yes.

M19 l) - To deal with the increased targets, boroughs will have to revise their Local Plans by reviewing their Site Allocations as required by the NPPF (para 22). The problem is that Government funding cuts have reduced their resources for planning work. The extra 20% fee for applications they can apply may help to address that problem but not in the short term.

London Forum’s proposals for NLP changes are on the next page.

PROPOSALS

Policy H1 needs an additional section in its part A, as follows.

'Boroughs should plan for the mix and type of homes sought within the total housing targets. Completions of affordable housing of the types described in the Mayor's Affordable Housing and Viability SPG are important and the necessary 65% affordable housing within the overall housing targets should be sought in local plans and in decision making. See paragraphs 1.4.3 and 4.5.1 and Policy H5 on Affordable Housing.'

H1 B 2) a) change "boundary" to "primary retail frontages"

Policy H1 B (2) (a) after "800m" [and in other references in the New London Plan to 800m to facilities] the words "walking distance" should be added.

Policy H1 B (2) (a) should have an additional sentence on the end - 'See Figure 4.2 for PTAL and the Glossary for details of where PTALS for each location can be found. See also Figure 4.3 for proximity to town centres.'

Policy H1 section D should have added after "Table 4.1" the words 'and the affordable housing content to meet their local needs.'

Following **Policy H1 E** (which seeks to exploit increased public transport accessibility) there should be an additional paragraph as follows.

'Where PTALs are below 2, boroughs should consider restricting or phasing development or limiting housing density until PTAL levels can be improved in order to avoid congestion on existing public transport and roads.'

Policy H1 should have an additional section following E
"Density of new housing should be constrained if local social infrastructure is inadequate to support additional residents until improvements can be delivered. See Chapter 9: Social Infrastructure"

Paragraph 4.1.2 does not appear to be correct. It states that "boroughs are not required to carry out their own housing needs assessment", yet they have to decide what type of housing is needed and where in order to seek the percentage of affordable housing types that they are required to decide upon from the total affordable housing, as in Policy H7 A 3) and paragraph 4.7.2.

Paragraph 4.1.4 summarises the content of the Mayor's Housing Strategy, but there should be additional words "See the Mayor's Affordable Housing and Viability SPD, Table 4.3 and the text that follows it for the types and quantities of affordable housing needed."