

## DRAFT NEW LONDON PLAN – EXAMINATION IN PUBLIC

### Written Representation Contribution

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Dated	6 <sup>th</sup> December 2018
Deadline for submission	Noon 14 <sup>th</sup> December 2018
Hearing	[M19] Housing Supply and targets

#### **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:**

- 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?
- 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?

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Table 4.1 - 10-year targets for net housing completions (2019/20 -2028/29). The housing supply targets as defined by the new London Plan at Table 4.1 do not reflect a balance between the areas of a local authority and their population densities. The London Borough of Bromley has a much greater area, 6,320hectares larger than Croydon with a much smaller population of 329,400

compared to Croydon with a population of 382,300, but Croydon has a much higher housing completion target of 107%. The following tabulation clearly shows this discrepancy.

### Example Extraction from Table 4.1

Authority	Targets		LA Area		Population		Council Tax
	Ten Year Target	Annual Average	Area (km <sup>2</sup> )	Area (ha)	2016	Area per person	Band D
Bromley	14,240	1,424	150.2	15,020.0	329,400	0.0456 ha/person	£1,452.71
Croydon	29,490	2,949	87.0	8,700.0	382,300	0.0228 ha/person	£1,636.96
Difference	15,250	1,525	-63.2	-6,320.0	52,900	-0.0228	£184.25
% increase	107.10%	107.10%	-42.08%		16.06%		

This Target Allocation is clearly unfair and unbalanced across outer London Boroughs.

Representations should be made to the Mayor of London to rebalance the Ten-Year Target as listed in the London Plan Table 4.1 for house building such that the allocation is more equally balanced in terms of area and population per hectare, across all Outer London Boroughs rather than the current methodology of defining Housing Targets.

This would reduce the need for loss of family housing and replacements in the Outer London Boroughs' suburban areas, such as Croydon, by high density flats whilst assisting the retention of the existing character of the more densely populated suburbs of outer London Boroughs.

Therefore, the policy is not sound as defined by NPPF (2012) para 35 and NPPF (2018) para 182:

- The policy is Not '**Positively prepared**' in that the targets are unfairly balanced across London boroughs.
- The policy is not '**Justified**' as there are alternative methods of measuring development targets.

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### 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?

The emphasis and proactive targeting of development in areas with already well-connected transport links, results in unacceptable increased densities in those localities with good transport links at the expense of localities with deficiencies of Transport facilities. This strategy would persist to provide unequal distribution of development, so ever-increasing densities in localities of good transport links, while other areas continue to retain a deficiency in transport links. This seems an incompatible logic as areas currently deficient in transport infrastructure will never have a case for improvement of the transport infrastructure and will continually remain under developed creating an unbalanced development future.

This is a chicken and egg scenario whereby development is restricted due to lack of infrastructure and infrastructure is restricted due to lack of development.

There needs to be longer term planning policy of improvements in infrastructure in areas of depleted or with insufficient transport infrastructure such that sustainable development can be rebalanced across sparsely populated areas of outer London boroughs. To increase development in areas that are already densely populated results in those densely populated areas being on an ever-increasing density path which is likely to cause difficulties in provision of suitable and acceptable accommodation or a level of public services provision to support the increased densities in the over populated areas.

Therefore, the policy is not sound as defined by NPPF (2012) para 35 and NPPF (2018) para 182:

- The policy is Not '**Positively prepared**' in that the proactive intensification of development in areas of high public transport accessibility results in the increased density population in already densely populated areas and sparsely populated areas continue to suffer deficiencies in transport accessibility.
- Similarly, such policies are not '**Justified**' as a measure of rebalancing public transport accessibility can assist the development in the sparsely populated areas and increase their accessibility to future development.
- The policy is not '**Effective**' as it promotes the '*status quo*' with respect to unbalanced levels of development and public transport accessibility across London Boroughs. Increasing transport accessibility would unlock areas for higher levels of development in areas which have previously had minimal development due to limited accessibility to public transport infrastructure.

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

The plan does not adequately consider the cumulative impacts of other policies on deliverability of development as there are no parameters defined to measure cumulative effects of developments or the cumulative effects of other policies.

In order to measure cumulative effects, the individual inputs that affect the overall cumulative effects need to be defined and the appropriate parameters logged and computed over time.

Each individual development can be assessed on its impact on the character of an area at that instant in time but the cumulative effect of individual developments is a continuous evolving parameter that requires updating as each development is approved. The area's Housing density, Residential density and population density all increase cumulatively.

The Density Matrix gave a range of densities for each local 'setting' which public services could support based upon PTAL. The loss of the Density Matrix results in the loss of a baseline range of densities at each setting and PTAL and therefore there is no method of assessment if a proposal has exceeded the recommended range or has contributed to a cumulative increase in the local setting's densities, which contributes to an overload of the public services. Re-instatement of the Density Matrix would allow a possible methodology to assess

cumulative increase of development over time.

A suitable mechanism to monitor and log these parameters needs to be defined by professional planning officers to enable cumulative effects to be computed and related to the required increases in infrastructure, public transport accessibility and provision of other public services.

This is a fundamental responsibility of planning officers, to provide methodical parameters and guidance rather than proposing subjective and vague policies which have no real effect on the actual management of the rate of developments appropriate for a locality.

Therefore, the policy is not sound as defined by NPPF (2012) para 35 and NPPF (2018) para 182:

- The policy is Not **Positively prepared** as there is no measurable criteria to establish cumulative implications of developments in relation to local setting population increase of requirements of public transport accessibility.
- The Policy is not **Justified** as there are no defined parameters to measure cumulative development.
- The policy is not **Effective** as it does not provide any mechanism for assessment of cumulative developments.
- The policy is not **Consistent with national policy** as defined in **NPPF (2012) para 174** in setting out policies to assess the likely cumulative impacts on developments.

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**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?**

Outer London Borough Local Plans should place greater emphasis on defining Neighbourhood Plans (places) in greater detail with respect to local character, Housing and Residential densities. More community involvement would be helpful to agree how localities should grow and to what extent. The current planning policies are top down from the local government without any input from communities whereas policies should reflect community involvement from the outset, to convince the local community of the need to increase capacity and to carry the community forward rather than to foist proposals on them.

Therefore, the policy is not sound as defined by NPPF (2012) para 35 and NPPF (2018) para 182:

- The policy is Not **Positively prepared** as there are no requirements for community involvement prior to a step change in local intensification.
- The Policy is not **Justified** as there are no requirements for affected communities' involvement prior to allowing local areas' increased density developments in their localities.
- The policy is not **Effective** as it does not provide any mechanism for assessment of cumulative developments.