

Examination in Public of the draft London Plan: Written submission by CPRE London (1142) to the EIP Panel, December 2018

SMALL SITES AND SMALL HOUSING DEVELOPMENTS (POLICY H2)

Matter 20: Are the presumption in favour of small housing developments of between 1 and 25 homes in Policy H2 and the targets in Table 4.2 justified and deliverable and will the policy be effective? In particular: a) Is the modelling of delivery from small sites in the SHLAA justified, including reliance on PTALs? b) Is it realistic to expect the small sites target to be achieved in the outer London Boroughs? c) Has adequate consideration been given to the cumulative impacts of this policy on, amongst other things, infrastructure, affordable housing provision and the character of some neighbourhoods as referred to in paragraph 4.2.5? d) Is the policy support for infill development within the curtilage of a house consistent with national policy in paragraph 53 of the NPPF which refers to resisting inappropriate development of residential gardens? e) Will the provisions of Policy H2 provide an effective strategic context for the preparation of local plans and neighbourhood plans including support for custom, self-build and community-led housing? Are the detailed criteria necessary and would they provide an effective basis for development management? Are the qualifications at Policy H2 HA-HC justified in themselves and would they effectively eliminate the positive presumption for small housing developments? f) Based on the historic delivery from sites below 0.25 hectares (whether allocated or windfalls) how will the Plan's expectations for delivery be achieved? g) What will happen in the interim pending the work to prepare area-wide design codes referred to in Policy H2 B 2)? h) Are the provisions of Policy H2 H) relating to affordable housing requirements for minor developments justified, notwithstanding that they are inconsistent with national policy?

1. CPRE London strongly supports the approach proposed in the draft London Plan towards promoting the use of small sites to meet housing needs, including the presumption in favour of small housing developments. The effective use of small sites will be critical to the supply of adequate housing in London in future, as well as to securing the best use of land, including maximising the use of underused land and buildings. We are keen to promote the sensitive use of such sites in appropriate locations taking account of cumulative impacts and infrastructure needs.

2. Having attended the technical seminar on the Strategic Housing Land Availability Assessment (SHLAA), and participated in an earlier meeting of the London Assembly Planning Committee on housing in outer London, we recognise that achieving housing targets for small sites will be a significant challenge for some Boroughs. However, we support the need to increase housing delivery on small sites as a strategic priority as set out in the draft Plan which should encourage improved performance. Boroughs such as Croydon have shown what it is possible to achieve through a concerted effort to prioritise and facilitate the development of such sites in recent years. It is disappointing that more Boroughs have not adopted such a proactive approach. Alongside the proposed presumption, the various components of Policy H2, if proactively applied

by all Boroughs, should help to increase delivery significantly, including by giving greater confidence to small housebuilders.

3. As stated in our submission on Matter 10, we believe there is considerable capacity to accommodate London's development needs within the existing built up area. We therefore strongly support the housing intensification promoted by a number of policies in the draft Plan. As stated above, we are concerned that not enough is being done to explore fully the capacity for intensification that exists in many London Boroughs. For example, we have recently completed a detailed survey of opportunities to make better use of previously developed land in the London Borough of Enfield, ranging from the very small (which could accommodate up to 10 units) to very large (which could accommodate several hundred units), which leads us to estimate that previously developed sites in Enfield could accommodate 60,000 residential units enough to meet around 20 years of housing requirements based on the latest 'Objectively Assessed Need' figures [a detailed analysis is available on request.]

4. As recognised in our submission on Matters 11 and 12, CPRE London believes it is also important that the diverse and distinctive character of London's local areas is safeguarded in promoting urban intensification. The draft Plan gives insufficient consideration to the protection and enhancement of this diverse local character. While we welcome the proposal in Policy H2 B2 that Boroughs should prepare 'area-wide design codes' to assist in increasing housing delivery on small sites, this will require additional resources which are not currently available in many areas. Where such design codes are prepared it is important that consideration is given to the importance of safeguarding London's diverse local character. While we welcome amendments to paragraph 4.2.7 of the draft Plan concerning small housing developments in conservation areas, there is a risk that future development will erode the distinctive character of existing neighbourhoods by creating homogenous 'anywhere' places unless greater attention is paid to local character and diversity. Statutory neighbourhood plans and informal community plans could play a useful role in describing the distinctive character of local areas, alongside conservation area character appraisals and design codes. To address these weaknesses, we have proposed in our submission on Matter 12 that amendments should be made to Policies D1 and HC1.

5. In our comments on the consultation draft of the London Plan, we raised concerns about the potential impact of the proposed presumption on green space. We therefore welcome the proposed changes in Policy H2 F7B to clarify that the presumption does not apply to 'Green Belt, Metropolitan Open Land, Sites of Importance for Nature Conservation, and other protected public open spaces'. We also welcome the proposed change to Policy H2 HB to clarify that there should be no net loss of green cover and that contributions are made to urban greening. This should assist in delivering the Mayor's commitment to increasing London's green cover.

6. CPRE London broadly welcomes the approach in the draft Plan to addressing the serious lack of affordable housing in London. Given that small sites are being required to play a greater role in housing delivery, it is right in principle that the use of such sites should contribute in some way to affordable housing provision. We therefore support the tariff approach to off-site contributions proposed in Policy H2 H. This should also be reflected more clearly in Policy H5 B which refers to off-site contributions being provided only 'in exceptional circumstances'. While we welcome the overarching framework proposed in Policy H5, we believe that the evidence would support higher strategic targets for affordable housing, particularly for social rent, requiring amendments to Policies H5, H6 and H7 as outlined in our submission on Matter 24.

CPRE London

December, 2018