

# Catalyst Housing Limited (2837)

## BACKGROUND

- 1.1 These representations are made in respect of the list of matters for consideration at the Examination in Public and taking into account the Draft New London Plan Minor Suggested Changes July 2018. These representations have been prepared by CBRE Limited on behalf of Catalyst Housing Limited ('CHL') further to our representations made on 2<sup>nd</sup> March 2018 ('March Representation'). As a G15 housing association, managing approximately 22,000 homes across London and the South East, CHL takes a close interest in proposed planning policy and welcomes this opportunity to formally comment on the draft London Plan. This document highlights CHL's position on the emerging plan but is also made in dialogue with, and in addition to, the representations made on behalf of G15.
- 1.2 In broad terms, there is much we support within the draft London Plan, not least its focus on communities, social integration, inclusivity and rebalancing. It is also ambitious, particularly in relation to housing delivery and we think it needs to be, if we are to stand a chance of addressing the housing crisis that has steadily worsened over many decades. A number of the concerns we raised in our previous March Representation have been addressed within the Minor Suggested Changes July 2018, and this is welcomed. However, we remain concerned about several policies (and supporting text), which in their current form are likely to inhibit - rather than accelerate - growth. Below, we have identified the relevant part(s) of the question(s) relating to each matter we are responding to, and outline our comments accordingly. Parts of the question(s) deemed not relevant to our response have been omitted.

## HOUSING QUALITY AND STANDARDS (POLICY D4)

### Matter M36

*M36. Would Policy D4 provide a justified and effective strategic framework for delivering quality housing? In particular:*

- a) Would Policy D4 focus on matters of strategic relevance? In this respect, would it provide appropriate flexibility in relation to housing standards in light of the planned amount of quality housing and local circumstances? (outdoor space, internal space, balconies, single aspect) Would it effectively address matters of daylight and sunlight?*
- b) In this respect, would it provide an effective and justified strategic framework for the preparation of local plans and neighbourhood plans in relation to this matter?*
- c) Would it accord with national policy particularly in light of the Nationally Described Space Standards?*

- 1.3 Part a) of the question in relation to this matter asks whether **Draft Policy D4** focuses on matters of strategic relevance and provides appropriate flexibility. In response, our answer would currently be 'no'. The policy focuses on a number of very detailed design standards relating to housing, which arguably are not strategic in nature. It may be that individual Boroughs have different needs and design requirements in terms of housing based on local need and market circumstances. The policy sets out detailed standards that are very prescriptive and lack flexibility. In particular, when considering market housing, there would be no flexibility to respond to different market and population trends that may influence design of new housing. There is a risk that over prescriptiveness hinders the ability to optimise the development potential of a site and deliver the housing required. Consequently, there needs to be some flexibility to apply standards on a site by site basis to

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take into account the unique circumstances of each site and allow the best design for that particular site to come forward. In addition, there is no reference to how standards would be applied to historic buildings and conversions where the layout of homes may be driven by overriding factors relating to protecting historic fabric and/or working within the constraints of the building.

- 1.4 In relation to single aspect units, there has been no material change to the draft policy and therefore our comments regarding single aspect units in paragraph 1.17 of the March Representation still stand and are set out again in paragraph 1.57 below.
- 1.5 Draft Policy D4 relates to housing quality and standards, and amongst other things sets out the approach to dual and single aspect dwellings. **At paragraph 3.4.5**, the supporting text also deals with single aspect units. However, as currently drafted it is inconsistent with the policy. The supporting text sets out a number of factors that would lead to a single aspect dwelling not being permitted. This includes general reference to "single aspect units that are north facing", which is inconsistent with draft Policy D4 E. This may be because paragraph 3.4.5 is drafted as a series of 'ors', and this could be resolved by amending the second sentence to "single aspect dwellings that are north facing and contain three or more bedrooms and/or are exposed to noise levels above which significant adverse effects on health and quality of life occur should not be permitted". In other words, the 'presumption against' does not automatically apply to all single aspect dwellings.