

# 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.

## DENSITY (POLICY D6)

### Matter M39

*M39. Would Policy D6 on optimising density be effective in achieving the intentions in Policy GG2 on making the best use of land and is the policy approach justified especially bearing in mind the cumulative impact on the environment and infrastructure? In particular:*

*a) Would the provisions of Policy D6 provide an effective strategic context for the preparation of local plans and neighbourhood plans? Would the detailed criteria provide an effective and justified basis for development management, are they all necessary and do they provide sufficient clarity about how competing considerations are to be reconciled by the decision-maker?*

*b) Will leaving density to be assessed on a site-by-site basis compared to the matrix in The London Plan of 2011 be effective?*

- 1.3 In response to the question regarding the effectiveness of **Draft Policy D6** in making the best use of land, there have been a number of changes to Draft Policy D6 around the matter of density which partly address our comments within our March Representation. The draft policy now includes paragraph EA which states 'Proposed development that does not demonstrably optimise the density of the site in accordance with this policy should be refused'. Amended paragraph 3.6.1A emphasises a design led approach to optimise density and sets out that the Mayor will provide further guidance on assessing site capacity and optimising density through a design led approach. As set out in our March Representation at paragraph 1.15, we raised some question over how different Boroughs would manage competing considerations and how they would respond to increased densities. We consider that the introduction of minimum densities as a fall back, would

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ensure densities do not drop below a certain threshold, where appropriate. Consequently, our comments relating to this still stand and are set out again in paragraph 1.4 below.

- 1.4 A number of the draft policies refer to the need to increase density in order to contribute to meeting growth needs. CHL agrees that this is needed, but remains concerned that many Boroughs, particularly but not exclusively the outer Boroughs where annual housing targets have been significantly increased, will not embrace this in the way envisaged by the Mayor. It is essential that densities are increased on small sites if they are to meet the ambitious targets set out in the draft London Plan. This may be less of an issue on schemes that are referable to the Mayor, as this will provide a clear mechanism to ensure site density is appropriately maximised. However, this will not be the case for non-referable schemes, and further guidance in the London Plan is needed. It may also be worth considering introducing minimum densities as a fall back, albeit with a clear expectation that densities should be higher than these. This should be reflected within **draft Policies D1 and D6**.
- 1.5 As an additional note, the changes to draft policy have added an emphasis on infrastructure capacity and Boroughs identifying this in Development Plans, with a requirement for site specific infrastructure assessments where development comes forward in excess of capacities allocated within the Development Plan (3.6.2A). The site specific infrastructure assessment would identify additional impact the proposed development will have on current and planned infrastructure, and how this can be appropriately mitigated either on the site, or through an off-site mechanism, having regard to the amount of CIL generated. There will inevitably be differing ways that Boroughs will review and interpret such assessments and therefore it is crucial to have further guidance around the scope of such assessments and clarity around how mitigation will be interpreted, to provide more certainty around potential infrastructure costs to developers to avoid unnecessary delay in sites being brought forward.