

# 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.

## TALL BUILDINGS (POLICY D8)

### Matter M41

*M41. Would Policy D8 provide a justified and effective strategic framework for the development of tall buildings? In particular:*

- a) Would the local definition of what is considered a 'tall building' provide an effective strategic framework to guide the location of tall building development?*
- b) Where there is no local definition of what is considered a 'tall building', would the definition at paragraph 3.8.2 be justified and would it be effective?*
- c) Would Policy D8, generally provide an effective framework to guide the location of tall building development, taking account of its wider surroundings and any cumulative effect?*
- d) Would it provide an effective strategic framework for the assessment of the impact of tall building development?*
- e) Overall, would Policy D8 provide an effective and justified strategic framework for the preparation of local plans, neighbourhood plans and development management in relation to this matter?*
- 1.3 In relation to this parts a) and b) of the question for this matter, we consider it likely that Boroughs may be conservative in their definitions of a tall building, especially if they have not had an opportunity to fully test heights. As such, Boroughs could opt for lower heights within Development Plans, which could drive down densities, even in suitable locations. This would conflict with other parts of the draft Plan and objectives around optimising the use of sites. In the absence of a local definition, the proposed definition in paragraph 3.8.2 would be suitable in our view.

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- 1.4 In relation to this matter, we also raise concern around the current draft wording on guiding the location of tall buildings through Local Plans. We question whether it is appropriate to identify locations at either the strategic or local plan level, as this may limit development which should be assessed on its own merit. If locations are to be identified, this is more appropriate at a local rather than strategic plan level, but it should be clear that tall buildings can also be considered on their own merits through the planning application process. There has been some change to the draft policy, however this does not address our concerns raised in paragraph 1.18 and 1.19 of our March Representation. Consequently, our comments regarding draft policy making it clear that tall buildings can be considered through the planning application process ahead of Local Plans being produced, and providing guidance around Local Plan production and the avoidance of predetermination as set out in paragraphs 1.5 and 1.6 below still stand.
- 1.5 With reference to **draft Policy D8**, it should not be necessary to identify areas suitable for tall buildings within Local Plans, as this will lead to delay in delivering sites, and could also preclude suitable locations coming forward during the life of a Plan. It should be made clear that tall buildings can be considered through the planning application process, ahead of Local Plans being produced. It should also make clear the need for Local Plans, in identifying suitable locations, to provide for tall buildings in other locations to be considered on a site by site basis.
- 1.6 Identification of areas suitable for tall buildings within Local Plans also gives rise to similar concerns to Areas for Regeneration in terms of avoiding the risk of predetermination. Depending upon the timescales for advancing a Local Plan and the period it is expected to cover, it is possible that some areas may need to be identified in advance of the necessary site-specific community engagement having been undertaken to inform decisions on the future of an estate/regeneration area. Great care is needed in the production of Plans to avoid the risk of predetermination. Given the potential for this to be handled in different ways by different Boroughs, we would suggest that the London Plan offers some guidance on this, particularly for areas to be identified where the precise form of regeneration has not been consulted upon.