

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 2nd 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.

GREEN BELT AND METROPOLITAN OPEN LAND (POLICIES G2 AND G3)

Matter M65

M65. Would Policies G2 and G3 provide an effective strategic context for the preparation of local plans and neighbourhood plans? Are the policies and detailed criteria justified and necessary and would they provide an effective basis for development management? In particular:

a) Is Policy G2 on London's Green Belt consistent with national policy and, if not, is this justified?

- 1.3 In response to part a) of the question relating to this matter, we would have to answer 'no'. There has been no material change to the relevant policies since our previous representation and therefore our comments still stand in paragraphs 1.42 of our March Representation. For clarity, we set these out again in paragraph 1.4 below.
- 1.4 **Draft Policy G2** goes further than national policy set out in the NPPF, **particularly A (1) and B**. As drafted, it is currently unsound and should therefore be amended to be consistent with national policy.