

ORGANISATION	LONDON FIRST
ID	1588
MATTER	M18 HOUSING STRATEGY

**M18. Will the housing policies achieve the good growth objectives in Policies GG1, GG2, GG3 and GG4 relating to building strong and healthy communities, making the best use of land, creating a healthy city and delivering the homes Londoners need?**

1. London First supports the principles of the Good Growth strategy. The housing strategy contained in the draft Plan is fundamental to both the delivery of the Good Growth objectives set out in GG1 to GG4 and the future economic success of London.
2. London First has recommended, in respect of M9: Good Growth, that Policies GG1 to GG6 in Chapter 1 of the draft Plan should be re-defined as 'Good Growth Objectives'. This is because they are scene setters containing broad-reaching, high-level planning and sustainability principles. They are not "*clearly written and unambiguous*", as required by NPPF2. To comply with paragraph 154 of NPPF1, any applicant would need to demonstrate in their planning application submission that their development proposal complies with Policies GG1 to GG6 of the draft Plan. However, London First determines that it would be technically difficult in planning terms to appraise a specific development proposal against the vague aspirations for Good Growth set out in GG1 to GG6 in a supporting Planning Statement or Design and Access Statement.
3. We welcome the draft Plan's more ambitious housing target of 65,000 homes per annum. This is a considerable increase compared to the current Plan's target of 42,000, but it is essential if we are to house London's growing population and address the housing backlog that has accumulated. It will prove challenging to achieve the Good Growth objectives unless more Londoners can gain access to a new home. The key issue for London First is whether the draft plan has policies in place that support this level of increase in net new homes as an absolute minimum.
4. In this context, it is important to reference the letter dated 27 July 2018 from the Secretary of State for Housing, Communities and Local Government, the Rt Hon

James Brokenshire MP, to the Mayor of London, which states the following in respect of the draft Plan's assessment of housing need:

*"It remains crucial however that you bring forward a revised London Plan that has regard to new national policies at the earliest opportunity. You will want to note paragraph 33 and annex 1 of the revised National Planning Policy Framework, which sets out that the Government expects plans to be reviewed early where all identified housing need is not being met and to ensure a plan is in place which reflects current national policy therefore expect you to review the London Plan to reflect the revised National Planning Policy Framework immediately once the London Plan has been published. I remind you that if this is not forthcoming, I have powers to direct the review to ensure London delivers the plan and homes that communities need."*

5. In response to this letter, Policy H1 of the draft Plan should make a commitment to undertake an immediate review of housing need once the Plan has been published.
6. Both GG1 and GG2 highlight the importance of building high-quality, high-density, mixed-use development to make the best use of land. To help deliver the Good Growth strategy, the draft Plan's housing policies place significant responsibility on boroughs, and London First has identified a number of risks that could constrain the draft Plan's ability to meet its Good Growth objectives. In particular:
  - a. **Density** – The boroughs are required to set appropriate densities for their areas in local plan policies, linking growth to good public transport connections (both existing and planned) and access to shops and local services. However, more support needs to be provided to the boroughs, especially those in outer London which are likely to experience greater resistance from their communities about intensification. It will be important to ensure that they have a strategic approach to density within their local and neighbourhood plans. Without sufficient clarity as to what constitutes appropriate densities, it is uncertain how this new approach will be applied across the whole of London and, specifically, in those areas that have significant potential to densify but have so far failed to do so.

To maximise the chances that the Plan's housing target can be achieved as a minimum, the Mayor should consider introducing safeguards to ensure that borough development plan policies and guidance do not set conservative densities that fail to realise the intensification opportunities that exist within London's existing built-up area. In the EiP Housing Technical Seminar on 6 November 2018, GLA Officers confirmed that the 2017 SHLAA assumes that densities in London will be delivered within the upper limits of the density matrix in the current Plan. Deletion of the density matrix without any alternative tool to maintain these assumed density levels risks undermining the Good Growth strategy. It is for these reasons that London First's

written statement pursuant to M39: Density recommends that minimum density levels be introduced in accordance with NPPF2 paragraph 123.

- b. **Small sites** – The growth strategy is overly reliant on small sites to achieve the Plan's ambitious housing target. The London-wide 10-year target for small sites in Table 4.2 of the draft Plan is 245,730 net housing completions, which equates to 37.84% of the overall London-wide 10-year targets for net housing completions. This is based on the assumption that a rate of delivery and level of density can be achieved far exceeding the rates or densities that have historically been delivered on small sites. This is not justified by adequate evidence. The 2017 London Strategic Housing Land Availability Assessment (SHLAA) assumes that the rate of delivery on small sites will double.

The SHLAA identification of supply includes a small sites windfall figure as a component of future supply as well as a small sites modelled figure (ref: Table 9.1 of the SHLAA) despite the fact that they are essentially the same thing because small sites are not identified/allocated. In addition, a great deal of work will be required by the boroughs to implement the small site strategy, and there will be a time lag after the Plan is adopted in 2019. The dependency of the draft Plan's housing strategy on the risky small sites strategy calls into question the delivery and effectiveness of Policy GG4.

- c. **Green Belt** – The Good Growth objectives, as they relate to making the best use of land, are restricted by the blanket protection placed on the Green Belt. The draft Plan's Good Growth objectives and housing policies are right to prioritise the development of brownfield land, but we have identified risks that question whether the supply of brownfield land alone in the capital can meet the draft Plan's housebuilding target. Accordingly, this undermines key elements of GG1 to GG4. While it is right that strong protection of the Green Belt remains, a more nuanced approach is required which acknowledges that accessible brownfield sites and land of no environmental or civic value exist in the Green Belt, and that some of these sites should be brought forward in a sustainable manner for development. This would be particularly pertinent for boroughs which can demonstrate that they cannot meet their housing needs through their existing supply of brownfield land.
- d. **Detail and prescription** – The housing policies are very detailed and prescriptive; this allows the boroughs very little flexibility to tailor policies to meet their local housing needs. For example, Policy H7: Affordable housing tenure is not an appropriate strategic policy and the boroughs should have discretion to apply tenure-mix targets at a local level to address local circumstances. The extent of detail in the draft Plan adds unnecessary complexity to the planning process, which, in

turn, increases both costs and the amount of time required to obtain planning permission in London. Ultimately, this risks inhibiting delivery and undermining the Good Growth objectives in GG1 to GG4.

**In particular how will the provisions of GG4E regarding ambitious and achievable build-out rates be put into effect?**

1. Policy GG4E should be reviewed in light of both the interim and final report of the Letwin Review. The Review is clear that build-out rates on large sites could be improved by looking at the diversity of housing tenure, design and size rather than establishing targets for how many homes should be built set against a specified time frame. Policy GG4E, as currently drafted, fails to acknowledge that external circumstances – for example, the health of the economy and other construction activity in the local housing market – play a significant role in the rate of delivery. In any event, given that the Government is yet to respond to the Letwin Review, it would be premature to embed the reference to build-out rates in GG4. The reference to build-out rates in GG4 should therefore be removed.

**Will the provisions of Policy H1 B-F provide an effective strategic context for the preparation of local plans and neighbourhood plans?**

1. Overall, policies H1 B-F provide an effective strategic context for the preparation of local plans and neighbourhood plans. However, two changes should be made to improve the policy. Firstly, Policy H1 should cross-reference Policy D6 in the draft Plan, in which London First recommends that minimum density levels be introduced in accordance with NPPF2 paragraph 123 (please refer to our written statement for M39: Density). This would provide boroughs with greater clarity as to what constitutes appropriate densities. Without this change, it is unclear how the draft Plan's new approach to density – as referenced in H1 – would be applied across the whole of London and, specifically, in those areas that have significant potential to densify but have so far failed to do so.
2. Secondly, the policy should support locally led (by the borough) reviews of Green Belt and Metropolitan Open Land through the local plan process and in accordance with the sequential test set out in NPPF2 (2018). A new policy H1 B 2) g) should be inserted as follows:

*B 2) boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:*

*[a.....f]*

*g) within the Green Belt and Metropolitan Open Land, sites close to existing or future transport nodes that are of poor environmental or civic value but that could support sustainable, high-quality, well-designed residential development that incorporates accessible green space.*