

## **London Plan Consultation**

### **Highbury Group Response**

#### **Section 2 Increasing London's Housing Supply**

While it is understandable that the GLA has adopted the Government's 88,000 annual target, the methodology used by the government to set the target - ie a % of existing stock with a multiplier based on income/ house-price ratios - is not a sound basis for setting a target, which should be consistent with pre-existing guidance on the Objective assessment of housing need, and should take into account an assessment of residential development capacity. It is therefore essential that the GLA carries out a comprehensive Strategic Housing Market Assessment (SHMA) which has been undertaken for previous London Plans. This is necessary not only to assess the total housing requirement, but to inform planning policy and targets for different types of new housing, in terms of tenure and affordability, size and bedroom size mix of homes, and built form, as well as need for housing for the elderly and other forms of specialist and supported housing. The SHMA needs to incorporate assessment of the of homeless households in temporary accommodation (including those placed outside London by London boroughs), the number of rough sleepers, overcrowded households, households in unfit housing, involuntary sharing and concealed households, asylum seekers given leave to remain and projections of future household population growth for the plan period, including both net international and inter-regional migration. Housing targets should be based on meeting the backlog in housing need over a 10 year period, not the 25 year period currently assumed. In assessing residential development capacity through an updated SHLAA, it is important to take into account appropriate density of development in terms of units and bedspaces per hectare to ensure an appropriate range of housing outputs in relation to the assessed needs - this means reincorporating into the London Plan policies the principle of sustainable residential quality which requires the reintroduction of the density matrix in an amended form.

##### **2.1 Brownfield First**

Any residential densification needs to be incremental and reflect both the range of housing needs to be met and the characteristics of the specific site in terms of public transport connectivity, and the social infrastructure within the neighbourhood and must follow the principles of sustainable residential development set out in the 2004 London Plan.

##### **2.2 Call for sites**

All site assessments should reflect the factors set out in our response to para 2.1 above.

## 2.3 Opportunity Areas

Development capacity in OAs need to reflect actual transport improvements and infrastructure provision, not just anticipated or wished-for provision.

The declaration of an opportunity area does not in itself justify densification, or justify the waiving of other planning policy requirements.

## 2.4 Central Activities Zone

Repurposing of lower grade office stock must comply with the normal planning policy requirements for residential provision. This is critical given the evidence of poor quality repurposing under Permitted Development provisions.

## 2.5 Town Centres and High Streets

Proposals supported

## 2.6 Industrial Land

Proposals supported

## 2.7 Wider urban and suburban London

Supported. Planning policy should however encourage the provision of additional homes rather than just the extension of existing large owner occupied homes.

## 2.8 Other Sources of Housing Supply

We support the consideration of appropriate sites within the Metropolitan Green Belt which meet planning policy requirements and which could provide appropriate housing. They should be incorporated with a comprehensive SHLAA rather than as a separate exercise, so that potential of such sites can be compared with the potential of brownfield sites.

Metropolitan Open Land should generally be exempted from consideration for residential development.

## 2.9 Beyond London's existing urban area

Ideally the SHLAA (incorporating assessment of potential housing development on grey belt sites) should be undertaken in collaboration with neighbouring planning authorities

## 2.10 Large scale urban extensions in the Green Belt

We support the consideration of appropriate sites for development. Such an approach needs to be undertaken in partnership with neighbouring planning authorities, reflecting the fact that most of the Green Belt is outside the London administrative boundary and that considerable development potential is adjacent to existing urban settlements in the Home Counties, much of which is not within existing green Belt designations.

## 2.11 Metropolitan Open Land

Approach supported

## 2.12 Affordable housing

Targets for different types of affordable housing should be based on a comprehensive SHMA. Given that the 2019 SHMA assessed that approximately 50 % of new housing needed to be social rented housing and that it is evident that the shortage of social homes has become more acute over the last six years, it is likely that a new SHMA will demonstrate an even greater need for social rented homes. It is probable therefore that the current London Plan target for social rented homes on individual schemes (currently a minimum of 30% of 35% on individual schemes (or 30% of 50% on public land or subsidised development) will need to be increased as well as the overall proportionate target. A target for intermediate (sub-market) housing should also be based on assessment of housing requirements. There is evidence that in recent years there has been an oversupply of such housing, relative to the supply of new social rented housing. Clearly the extent to which any target for social rented housing can be met will be dependent on the amount of subsidy available, both in terms of total subsidy and in terms of subsidy per home. Funding should be on the basis of the number of bedspaces provided rather than the number of units in order to ensure an appropriate proportion of family sized homes.

## 2.13 Planning for affordable housing

Specific targets should be set by tenure/affordability and for bedroom size mix, in terms of 3B and 4B homes.

The threshold for fast track approvals for schemes on private sites should be raised from 35% affordable housing to 50% affordable housing to be consistent with the London-wide 50% target, but only where schemes are consistent with targets for social rent and bedroom size mix.

#### 2.14 Estate Regeneration

We support the full replacement of social rented homes in terms of floorspace.

#### 2.15 Build to Rent

Specific planning consent should be required

#### 2.16 Other housing options

Targets should be set for housing for older people and people with disabilities based on the needs identified in the SHMA or other surveys.

Housing built for short term letting, including as tourist accommodation, should require specific planning consent.

#### 2.17 Specialist and supported provision

London wide targets could be derived from a SHMA. However local planning authorities should be in the best position to set priorities for specific types of accommodation on specific sites. For developments referred to the Mayor, the developer should be required to demonstrate that the local planning authority has been consulted on the potential for specialist provision.

#### 2.18 Purpose- built student housing

Housing for students should require specific consent and should only be provided on sites not suitable for general needs housing. Ideally student housing should be built within existing university campuses.

Student housing provision should not count against a borough target for general needs housing provision. New housing comprising non self- contained accommodation should also require specific planning consent and also be monitored separately

#### 2.19 Gypsies, travellers and travelling showpeople

The London Plan should set pitch targets based on an assessment of requirements and the availability of suitable sites