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Mr Sadiq Khan
The Mayor of London
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23 February 2018

Dear Mr Mayor

Draft London Plan – Consultation response from GLA Conservatives

I am writing on behalf of the GLA Conservative Group on the London Assembly, in response to the consultation on the draft London Plan, and to express our concerns about a number of different planning policy areas within the draft Plan.

Family homes and overcrowding

The new draft London Plan fails to make sufficient provision for new family-sized homes of three and four bedrooms. This is especially concerning in light of the removal of the 36% family homes target from the draft Housing Strategy. This means that, for the first time since 2008, there is no policy in place to encourage family-sized housing, either in the draft Housing Strategy or draft London Plan.

Targets for family-sized housing are important because, without this intervention, the system would be skewed towards smaller units that are cheaper to build. This would especially be the case with the high level of housing targets proposed within the new draft London Plan.

The latest figures indicate that 360,000 children under 16 live in overcrowded homes in London. 34% of children in social rented housing and 22% of children in private rented housing are overcrowded.¹ A failure to build sufficient numbers of family-sized homes would make this problem worse, when we should be striving to make it better.

¹ <https://files.datapress.com/london/dataset/housing-london/2017-01-26T18:50:00/Housing-in-London-2017-report.pdf>

Yet the Strategic Housing Market Assessment (SHMA), which accompanies the London Plan, claims that 55% of all new homes should be one-bedroom units, and within low-cost rented housing, 21,318 homes a year should be one-bedroom units, out of a total of 30,972, which is 69% of the total. It claims just 4,343 low-cost rented homes a year should be three or four-bedroom units, or 14% of the total.

These figures appear to be based on flawed assumptions that large numbers of adult children should move out of the family home and into one-bed social rented units. This would be a very poor use of housing resources as well as a wasted opportunity. In fact, the Assembly's 'Crowded Houses' report from 2011 found that building a single family home could solve the problems of several households at the same time, due to the 'churn' effect of freeing up other homes further down the line.²

We would therefore strongly recommend that the SHMA methodology is revised and its findings revisited in order to improve the assessment of the need for family homes in London.

Policy H12 passes responsibility on to boroughs to set size mix targets for affordable homes. This is inadequate for a number of reasons. First, this is a strategic London issue that requires a strategic approach from the London Plan. Secondly, this would require boroughs to amend their local plans, a process that typically takes far longer than the London Plan, potentially leaving a policy vacuum in this area for several years whilst new local targets are prepared. Thirdly, any attempt by boroughs to set meaningful family homes targets could be significantly undermined by the SHMA findings mentioned above. **Policy H12 should therefore be revised to set a minimum level of family-sized homes provision in London, at least until boroughs are in a position to set their own targets.**

In addition to this, part C of policy H12 prohibits boroughs from setting size mix policies for intermediate and market homes. We can see no justification for this, and therefore **this provision should be deleted.**

Meanwhile, paragraph 4.12.3 contains very troubling language which suggests that two-bedroom units can be suitable for families, and that "this should be taken into account when assessing the needs that different sized units can meet". **This wording should be amended or removed.**

We are also concerned about the paragraph 3.4.1 of the Plan, which instructs boroughs to 'resist' new homes with 'significantly' high space standards. This runs the risk of minimum space standards being seen as a maximum, with the prospect that new homes could be refused permission because they provide too much space for their residents. This would be a highly retrograde step and therefore **this wording should also be removed.**

Without further amendment as described above, there is a significant risk that the London Plan will lead to a reduction in family-sized units, a proliferation of one and two bedroom flats, and increased levels of overcrowding. Nobody who is concerned with housing in London should want to see any of this occur.

² <https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/crowded-houses>

Small sites policy

Policy H2 on small sites, and the accompanying small sites targets, has understandably caused great concern around London, from boroughs, communities and local organisations. In particular, redefinition of 'small sites' in part D(2) of the policy, to include conversions, redevelopments and outbuildings, will cause significant problems, especially in suburban areas.

This definition goes much further than the general understanding of what constitutes 'small sites', which would refer to small disused areas of land, for example vacant garages on housing estates. Many boroughs have successfully delivered new homes this way, and this is the approach that should be encouraged.

The current policy will adversely impact the character of suburban streets, with developers now encouraged to buy up family houses and turn them into flats, or set up new homes in outbuildings. Such developments could dramatically intensify local streets and overwhelm local infrastructure.

Policy H2 should therefore be revised to exclude the definitions in part D(2) mentioned above, and the small sites targets revised down accordingly. Also, given that 25 units could still constitute quite a sizeable development, especially in suburban areas, **a more appropriate limit for this presumption would be 10 units.**

It is also of concern that the geographical area for this policy would include conservation areas, heritage sites, Royal Parks, open space, public houses and other protected and valued sites. It is not sufficiently clear that such protections could withstand a 'presumption in favour' of small sites development, or that this 'presumption' could be overridden in the event of a policy conflict. For the avoidance of any doubt, **it should therefore be made explicitly clear that any small sites policy should be subject to these protections and the 'presumption in favour' should not apply where such protections are in force.**

Loss of garden land

The previous London Plan, through policy 3.5, supported local boroughs to resist the development of new dwellings on back garden land. This was a hard-won policy, which has successfully protected many back gardens from development. Before that time, the London Wildlife Trust estimated that 500 gardens, or parts of gardens, were being lost a year due to housing development. This was equivalent to 6 hectares a year, with the average development losing 200 sqm of garden land.³

It is therefore extremely disappointing to see that this policy has been removed from the new London Plan, which would effectively disenfranchise those boroughs which have chosen to protect back gardens within their own local plans.

The loss of back gardens would harm local character and local biodiversity, which cannot necessarily be adequately replaced by new 'green cover' elsewhere. Indeed, the London Wildlife

³ <http://www.wildlifetrusts.org/news/2011/06/17/new-report-reveals-scale-london%E2%80%99s-garden-loss>

Trust recently told the London Assembly Planning Committee, in relation to the new London Plan, "There are real concerns that the further loss of gardens will have a negative effect on biodiversity."⁴ It is also significant that the loss of protection for back gardens would be contrary to the National Planning Policy Framework.

Policy 3.5 should therefore be reinstated to maintain the current level of protection for back gardens. It should also be made clear that any small sites policy would be subject to garden land protection policies where they are in force. Without such protections, the London Plan will fail in its ambition to increase green cover in London, and indeed a substantial loss of green cover is far more likely to take place.

Housing density

The removal of the housing density matrix means there are now no guidelines on density limits for new developments, to ensure that they are appropriate for the location and PTAL (public transport accessibility level) of the development. This has been replaced by much more vague guidance around aspects such as design, which leaves this wide open to interpretation by developers. **The density matrix should therefore be reinstated to ensure that new developments can be set at an appropriate level for their context and surroundings.**

We also note that the new housing target of 64,935 homes per year has led to dramatic increases in borough housing targets, which appear to have been set without borough involvement. Whilst we strongly support policies that meet London's genuine housing need, we are concerned that the methodology of the Strategic Housing Market Assessment (SHMA), in overestimating need for one-bedroom homes compared to larger family homes, may have over-inflated the number of new homes needed in each borough. **This should therefore be re-examined to ensure that appropriate targets are being set for each borough, reflecting the number and type of new homes that are truly needed and the capacity for delivering these new homes.**

Tall buildings

As a result of the new London Plan, boroughs will be under significant pressure to approve denser, taller developments. Historic England recently told the London Assembly that it was concerned at the potential for very tall buildings to damage the setting of world heritage sites.⁵ Given this situation, the London Plan should be providing strong tools to resist tall buildings where they are inappropriate. However, the new London Plan policies are insufficient to this task.

Policy D8, part B, encourages boroughs to identify the locations where tall buildings would be appropriate. This is problematic because it implies that boroughs do not have discretion over whether to provide tall buildings, merely over where these should be. This is far more prescriptive than previous versions of the London Plan. **This section should therefore be amended to make clear that boroughs will not be forced to identify sites for tall buildings, and that boroughs will be supported in setting low to mid rise height limits if they feel this is most appropriate.**

⁴ London Assembly Planning Committee meeting, 30 January 2018

⁵ London Assembly Planning Committee meeting, 30 January 2018

Parking spaces

The prescriptive requirement in policy T6 for many types of new development to be 'car free' is impractical. It does not meet the needs of many areas of London, particularly in outer London, where public transport provision is not sufficient to avoid car usage. **This provision should therefore be removed.**

We are also concerned to see the reduction in parking standards more generally within the Plan. The trend in previous London Plans had been to increase flexibility for boroughs regarding parking provision in new developments. This goes completely in the wrong direction.

Removing car parking spaces will not necessarily reduce car ownership or car usage. More likely, residents will still own cars but will park them elsewhere, leading to parking overspill and a greater level of congestion and inconvenience for others. The way to achieve modal shift is to provide better options than car usage, not try to restrict parking supply for people that do not have adequate alternatives.

Failure to provide sufficient parking spaces undermines local support for new homes. It also undermines the roll out of electric vehicles, because people will have fewer opportunities to charge their cars at home.

It would be preferable to leave parking provision to the discretion of boroughs, who know their areas best. However, the new London Plan should at least avoid additional restrictions compared to the current situation.

Industrial land

Whilst we understand the aims and objectives of the 'no net loss' of floorspace in Strategic Industrial Locations (SIL), set out in policy E4, we have concerns about its practical implications.

A blanket policy to prevent the release of brownfield industrial land, regardless of local context, could have a dramatic impact on the ability to provide new homes. This will be a particular issue in housing zones, which contain 491 hectares of SIL land and are expected to deliver thousands of new homes. This policy is already having an impact on developer confidence to build new housing, as we see from the current problems at Meridian Water housing zone in Enfield.

This approach should also be seen in contrast with the removal of protections on garden land development. It indicates a decisive shift from development on brownfield land to development on gardens and green space.

Rather than a 'one size fits all' approach, it would be preferable to leave this matter ultimately to the discretion of local boroughs through their site allocation policies. Instead of a blanket approach, the Plan could say that it encourages boroughs to bring forward policies to protect industrial floorspace where this can be locally justified. This would be similar, for example, to the wording used for garden land protection in the previous London Plan.

Relationship with national and local planning policy

We note the statement in paragraph 0.0.20 that, “On some occasions, the Plan deviates from existing national policy and guidance; this is mainly where the Plan is delivering on a specific Mayoral commitment and reflects the particular circumstances of London. The scale of the Mayor’s election victory provides a significant political mandate to use the planning system to deliver his manifesto commitments.”

Whilst we understand the Mayor’s desire to have specific policy approaches for London, anything proposed in the London Plan has to be workable. Setting up unnecessary conflicts with the government would make it much more difficult to address the challenges that London faces, especially the need to build new homes. The London Plan should be a genuine attempt to address these challenges, not an opportunity to set up excuses for failure and to start a blame game with the government. Londoners deserve better than that. In that respect, **the language used in this paragraph is extremely unhelpful and unwise.**

In addition, if the Mayor is asking the government to recognise his own election mandate, he should also extend the same courtesy to London borough councils and their own electoral mandates – which, after May 2018 will be more recent than his own. **The Mayor should therefore ensure a more collaborative approach to matters such as housing targets, small sites, parking standards and industrial land, recognising the needs of different local communities.**

The GLA Conservative group welcomes the opportunity to respond to this consultation, and we would urge you to take on board our concerns and the concerns of many in London to your draft London Plan policies.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Andrew Boff', written in a cursive style.

Andrew Boff AM
On behalf of the GLA Conservative Group