

2 March 2018



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Response to The Draft New London Plan Chapter 4 Housing

Submission response 2 March 2018 Sent by email

On behalf of The Housing Forum, I am pleased to submit the following response by The Housing Forum that champions good practice. It is a unique cross sector membership organisation of 150 major organisations that includes house builders, housing associations, local authorities, consultants, manufacturers and investors.

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Introduction

The Housing Forum welcomes the draft New London Plan and its ambitions for much needed new housing but is concerned that the Mayor's ambitions may not be fully realized. The draft Plan is clear and recognises the importance of design, especially in high density development. It sets out to optimise the use of all suitable, available brownfield sites and provides 10-year housing targets and opportunities to review. The draft Plan contains a clear commitment to the delivery of affordable housing and promotes diversity in the supply chain.

The issues we have commented on relate to the type and situation of sites likely to be developed, ongoing service and design issues. We discussed the draft Plan at a Development Partnership Forum on 26 January and our response has been informed by that meeting and the views of The Housing Forum Board.

Key points in response to Chapter 4 Housing

Green Belt

Even with a focus on brownfield development, delivering the new targets will be challenging without some consideration of green belt land. The outer London boroughs are looking at some greenbelt development, including around new transport links, such as the Elizabeth Line. Some designated green belt land is of poor environmental quality and could be successfully redeveloped for housing without the loss of amenity.

Release of low grade industrial land for housing

With the substantial targets proposed, doubling requirements in most boroughs, there is the risk that restricting the release of low-grade industrial land which could be used for innovative ways of new housing provision could be a lost opportunity.

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Density matrix

For some long term landlords offering intermediate tenure such as shared ownership, the requirements for a management plan could limit flexibilities in long term cost planning

Small Sites

Development at scale needs to be achieved to meet the needs of the population and release of larger sites should continue to be a priority. However, there is a right focus in the draft Plan on small sites and the role of small builders but with the lack of clients willing to fund and develop small sites, ways need to be found to stimulate such development when up-front costs can be prohibitive for SME builders. The GLA could be more proactive in using its funds to support SMEs and ensuring that any bidding process is simple and straightforward.

Intensifying the use of small sites for housing development has to be balanced with the requirements of the modern business economy, such as just in time deliveries and services.

Design Principles

The plan indicates that The Mayor will set out design principles for small housing developments. Any introduction of specific additional planning guidance should not bring confusion with the nationally described Space Standards and guidance issued in 2016 or delay to the process.

About The Housing Forum

The Housing Forum is a uniquely cross sector membership organisation of 150 major organisations including house builders, housing associations, local authorities, consultants, manufacturers and investors. We are at the forefront of debate and championing of good practice. Our regular work on new build and regeneration issues assists the industry in interpreting the housing market and consequently, supports and encourages investment.

The Housing Forum has considered many of the issues in relation to affordable housing, housing at scale and quality in our recent reports and findings which are drawn from across the supply chain, public and private sector.

We held a Development Partnership Forum on 26th January featuring the Plan and the response has been prepared from the outcomes of that meeting and the views of The Housing Forum Board.

Yours faithfully



Shelagh Grant
Chief Executive
The Housing Forum

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