

Just Space response to consultation on SHLAA Methodology January 2017

To: Andrew Russell, London Plan Team, City Hall, London
SHLAA@london.gov.uk

Dear Andrew

Following the consultation meeting on 1 December we have considered the draft Methodology paper. These are the crucial comments from our network. There are many minor points we might wish to make but it seems wiser to concentrate on these key points.

The LTF and LFCAS, which are part of the Just Space network, are commenting independently.

We shall be writing separately (to James Gleeson) about the (SHMA) study of housing needs and demands which you said is running to a later timetable.

1. We do not accept the validity of the distinction between ‘technical’ and ‘policy’ issues which underlies the decision process on the SHLAA because there are so many crucial policy issues embedded within the coefficients and definitions of the Land Availability process. That’s why we are so glad that community interests are included in the ‘technical consultations’. The same has happened with your colleagues in GLAE over the Economic Evidence Base: congratulations to them too¹.

2. A major concern is about the serious threat to the diversity and robustness of the London economy, to the livelihoods of many Londoners and the increased need to travel which would result from:

- (i) continued attrition of Strategic Industrial Land SIL. The losses in recent decades have been much more severe than provided for in the Plan and we consider that a complete moratorium or at least a presumption against loss is called for²;
- (ii) losses of workspace (offices etc) under the Permitted Development Rights over which the Mayor and Boroughs have little control, but which exacerbate the damage to the economy and loss of suburban jobs;
- (iii) the prospective risk of workspace losses which would result from the redevelopment in depth of some of London’s high streets, areas where extensive research has been done, showing what a large and diverse range of jobs are done in and behind the frontages. The implications of these embryo policies and the conditions which should attach to them will not be clear until the Plan is made but, in the mean time, the inclusion of housing targets for these areas adds dangerously to the threat to the economy.

We remain very dissatisfied by the fragmentation of studies of the London economy and its space requirements: split between retail, offices, industrial – and with industry further split between supply and demand studies.

At the very least, Boroughs and/or the Mayor should be required to indicate the numbers of existing jobs in sites included in the SHLAA. (In the longer run we shall be arguing for systematic local economic studies to **precede** such changes.)

2. An equally crucial main concern is that existing social housing is being sacrificed on the altar of total housing numbers and that the London Plan would be

quite wrong in facilitating further losses of social housing through estate “regeneration”. The proper place to debate this priority is of course in the preparation of the London Plan. However the SHLAA should avoid counting (even as low probability sites) estates where consultation and formal approval and planning processes are not complete. Thus we are very unhappy with

“Estate regeneration schemes

3.46 *Boroughs are able to include large sites included in an estate regeneration programme. As these sites include existing residential dwellings, the SHLAA system allows boroughs to amend net additional housing figures included in the system and by phasing period in order to take into account demolitions and build out rates over time.”*

Specifically (a) the inclusion of such estates is premature until the schemes are agreed; and (b) the numbers of existing and proposed units in each category (social rent, LLR, “affordable”, etc) should be required and be publicly recorded.

We are also unhappy that proposals to use school and recreational sites for housing can be included by Boroughs in the SHLAA before they have been fully approved. Our member organisations are increasingly concerned about these losses of social infrastructure.

3. The SHLAA should also seek to estimate the required capacity for **new Gypsy and Traveller sites**, which contribute to meeting objectively assessed need. Given that to date very few local authorities have identified a 5-year supply of land to meet these needs in line with national planning policy, this approach would support councils in overcoming some of the barriers to delivering Gypsy and Traveller accommodation and meeting their Public Sector Equality Duty. In addition, to ensure existing Gypsy and Traveller sites are safeguarded for future generations, this designation should be added to the list in paragraph 3.34 under ‘Excluded sites’.

4. Finally on a matter of process/procedure. It was mentioned at the December meeting that all the sites in the SHLAA (except the confidential ones) would be included in the online database and that this would be visible in map form for the first time. This is immensely valuable and will be a boon to community groups in London. Please can you confirm that this **mapped material** will be publicly accessible.

Just Space
January 2017

¹ See <https://justspace.org.uk/2016/05/28/what-london-economy>

² Just Space, 2016, [Towards a community-led plan for London: policy directions and proposals](#), Policy C, p28