

Additional representations relating to the correction to Table 3.1 and its implications

Response by Just Space www.justspace.org.uk

Just Space, a pan-London informal alliance of community groups, campaigns and concerned independent organisations, often working with the Bartlett School of Planning, aims to improve public participation in planning and make policy fairer towards communities in a system dominated by the interests of developers. This submission is the result of 3 years of consultation in preparation for the draft Plan, with the participation of dozens of groups, including three conferences and the production of an Alternative London Plan for a Caring City.

We request to speak at the Examination.

The corrected housing targets (for nearly a third of the boroughs) in Table 3.1 is unsound because it is not positively prepared, justified or effective

Table 3.1 sets out the ten-year housing targets within Policy HN1 Increasing London's Housing Stock. As stated in the rationale for that policy, these targets are "reflective of the expected delivery associated with following the spatial strategy set out in MBUL1".

As set out in the introductory chapter, the Plan allocates targets to each plan-making authority in London based upon an assessment of what could be feasibly deliverable in the coming decade, on the basis of policies aimed to boost housing delivery through, inter alia "making a step change in the approach to small sites (e.g. London-wide design code)"¹

However, there is simply insufficient evidence that this expected level of delivery on small sites is achievable, since the key information – the Small Sites Design Code – has not been available until very recently, toward the end of the draft London Plan consultation. It would appear from this sequencing that even the corrected housing targets were arrived at prior to the Small Sites Design Code being finalised and its assumptions and evidence available to inform those targets or be properly integrated into calculations of viability and estimations of deliverability.

The 'Implementation' commentary of policy HN1 states that "the housing targets in Table 3.1 are capacity based, with the evidence supporting the London Plan demonstrating the extent to which the identified housing needs of London can be accommodated (see the GLA's SHLAA)"². The SHLAA admits that "an approach to modelling the contribution which can be made from development on small sites... draws on work to prepare a London Small Sites Design Code"³ Given the late publication of the Small Sites Design Code, it is simply unconvincing to propose that the evidence base documents were readily available to support the formation of policy.

With regard to MBUL1, the proposed quantum of additional new homes (at part B) is not supported by the evidence base, since the Plan proposes a significant proportion of the growth to be delivered on small sites.⁴ Whilst this may be a supportable idea, there is simply insufficient evidence that the expected level of delivery on small sites is achievable. The SHLAA arrives at the figure of 136,914

¹ 1.13

² dLP 3.15

³ SHLAA 1.6

⁴ MBUL1, B(4); MBUL2 B(2) and B(1) even proposes the use of LDOs to enable this

homes – a quarter of all of the target’s new homes – coming from small sites “modelled based on an uplift in rates beyond historic windfall to account for the anticipated effects of policy interventions.”⁵ This is just under twice the number of identified large sites expected to come forward through the Land4LDN platform, and is based on notional capacity based on “intensification types” (“estimated through application of indicative unit per hectare densities for small site developments.”⁶) as well as notional availability and deliverability based on historic trends, along with viability.

In short, the supporting evidence to justify the policy approach has not been made available through the consultation, and it is unclear at best whether the policy is supported by an appropriate evidence base and/or is justified.

Given this, we consider that the corrected Table 3.1 – as well as multiple related policies in the draft London Plan, including MBUL1, MBUL2, and HN1 – have not been positively prepared.

⁵ SHLAA 1.9

⁶ Ibid 8.24