



THE HOUSE BUILDERS FEDERATION

LONDON PLAN: Draft Housing Provision Supplementary Planning Guidance Response of The House Builders Federation, March 2005

1. Introduction

Thank you for consulting the HBF on this Draft Supplementary Planning Guidance (SPG). We present our response to this Draft SPG in two parts.

First, we are providing a general overview as to the form of the Draft SPG and how, in our view as the representative body for the private house building industry following consultation with our membership, the Draft SPG will not assist the Mayor to meet his fundamental objective of accelerating the delivery of new housing towards the annual target of 30,000 new homes.

Secondly, we provide our views on the specific detail of the Draft SPG on a paragraph-by-paragraph basis.

2. Overview

Firstly, the HBF are concerned at the length of this SPG. Regrettably, we consider it to be verbose, often simply repeating sections of the London Plan to no real purpose or effect. The implications of this are that the SPG loses any real sense of clarity. The aim of SPG is to supplement the London Plan and this SPG could be condensed into a much more concise document in meeting that objective.

The Housing Provision SPG should be focused on increasing and accelerating the delivery of new housing towards the Mayor's aspirational figure of 30,000 new homes per annum (Policy 3A.1, London Plan, 2004) yet there is very little in the SPG that supports this objective. Rather, the emphasis is upon the provision of Affordable Housing. The two are not separate entities; the majority of affordable housing is delivered through private developments, thus an increased output of housing will lead to an increased output of affordable housing. This also demonstrates that if the Draft Affordable Housing SPG and this Draft Housing Provision SPG had been prepared jointly, as logic would suggest, then a much greater degree of continuity would have been achieved.

Since the consultation exercise of the Draft Affordable Housing SPG and the publication of this Draft Housing Provision SPG, the Government have issued a revised PPG 3 Consultation entitled "Planning for Mixed Communities" (January 2005); this has implications for both documents. Most notably, there is a need to include reference to a 'cascade mechanism' within the combined document, as detailed in Paragraph 16 of the revised consultation and the introduction of Local Housing Assessments, as detailed in

Paragraph 3, this will have significant effects for Section 10 on “Housing choice and the needs of London’s diverse population”, which will be examined in greater length in the following section of our response.

3. Commentary on the detailed aspects of the SPG

Section 2 – Introduction

This section highlights the lack of brevity and clarity within this document. It is not clear what the purpose and intent of this section is. If it is to clarify the housing delivery targets prescribed in the London Plan, then Section 3 deals with that. The London plan has already defined housing targets. This SPG should now focus upon mechanisms to deliver those objectives, both in quantitative and qualitative terms.

Para 2.9 – HBF support the Mayor’s drive to achieve a higher output of 30,000 homes a year. We feel this should be the thrust of the SPG, increasing the current achieved levels to this higher plateau of a delivery of 30,000 homes per annum. In the views of HBF, this draft SPG, as written, combined with the restrictive nature of the draft Affordable Housing SPG, will inhibit, rather than enable, this push towards this next level of housing provision.

Para 2.13 – There should be an explicit clarification that the strategic target of 50% is from **ALL** sources within the text, in line with Policy 3A.7 of the London Plan and Para 3.51 of the London Plan EiP Panel report. There should be an inclusion of all those potential sources in delivering this strategic target within the text, to remove the current mistranslation that the 50% strategic target automatically assumes a 50% target from private developments.

Section 3 – The London Plan

Para 3.4 – On the issue of new housing provision targets, this SPG should address arrangements for remediation actions against those boroughs that do not meet their targets. The recently published London Plan Annual Monitoring Report 1 (January 2005) shows that although the overall minimum target of 23,000 housing completions is being met, there are a number of boroughs that are chronically under-achieving to an unacceptable level. This inconsistency with housing delivery within boroughs does not appear to have been considered by the Mayor.

Section 4 – Maximising Housing Capacity

The title of this section requires re-consideration. Maximising housing capacity would mean an emphasis on the re-development of sites for residential purposes. It would mean playing down the mixed-use objectives within the SPG. We presume that the GLA are referring to the effective use of residential development sites. The issues regarding location and proximity to public transport are logical.

The effective use of residential development sites does not mean an emphasis upon maximising numbers of units to be delivered from all sites. The section on low density housing is very relevant as it demonstrates the need to provide different household types. It is this balance between quantitative and qualitative approach. There have

been problems in London with boroughs seeking larger affordable units on high density developments, which has often resulted in poor planning. This has prompted the London Housing Federation to consider ways of delivering successful high density family developments. Yet this SPG ignores this qualitative aspect of housing delivery.

Para 4.9 – Why are lower density developments more appropriate for higher proportions of social rented affordable housing? This is simply a stated preference of the GLA, which has no substantive explanation. Para 4.12 states that the Mayor’s affordable housing requirements apply equally to higher and lower density developments! Furthermore, the covering letter to the Consultation PPG3 Planning for Mixed Communities states:

“...local planning authorities should plan for the range of different households likely to need housing over the plan period and not for a range of size and type of housing based on floorspace or numbers of rooms.”

Para 4.10 – Whilst Paragraph 3.43 of the London Plan states that affordable housing should be integrated with the rest of the development and have the same external appearance as the rest of the housing, it does not say that affordable housing should have the same entrance arrangements as the private housing. This stipulation on entrance arrangements should be deleted, as this is new policy.

Additionally, affordable housing units need to conform with the Housing Corporation’s Scheme Development Standards, whilst market housing does not, this can and will lead to aesthetic differences between units. Registered Social Landlords are wary of certain integration techniques such as ‘pepper-potting’ as this creates management problems. Thus, a degree of flexibility needs to be maintained on these issues.

Para 5 – HBF welcome the acknowledgement that the provision of high-density housing has implications on service charges. This SPG makes reference to the London Housing Federation research on high density family living. Unfortunately this has not yet addressed the implications upon service charges.

Section 5 – Sustainable Residential Quality

It is not clear how the section on the London Plan density location matrix is supplementing the London Plan. Also, why does Para 5.3 go off at a tangent into discussing sustainable and successful higher density housing? What does this have to do with the matrix, which is an accessibility determinant? The same concern applies to the section on PTAL’s.

Para 5.15 – We must question the validity of using research from 1994. Design has progressed significantly since then and this is readily visible in London. The assumption that higher density development will always increase site values is very questionable. The reference to this then being able to cross-subsidise more affordable housing suggests that the whole design process revolves around the provision of affordable. This is very concerning.

Para 5.16 – “ ... changing attitudes towards car use and ownership” is a very weak basis for decision-making on the amount and location of car parking spaces, and is

purely subjective. This could suggest a need for larger car parking spaces in order to accommodate the increased ownership of 4x4 vehicles!

Para 5.17/5.19 – There are confused messages here. On the one hand car-capped and car-free housing will allow higher densities to be realised without compromising design, whilst on the other the use of front garden space for parking need not compromise the quality of the residential environment? How do developers interpret these statements consistently?

The HBF would endorse a flexible approach to car parking provision. However, this is not always the case with Boroughs.

Section 6 – Efficient Use of Stock

Firstly, it is disappointing that the emphasis in this section is on private housing with the assumption that all local authority/RSL stock is efficiently occupied. A reference to the choice based lettings initiative designed to promote efficient use of stock would be welcome. It is not clear what the section on vacant dwellings is seeking to achieve. It simply appears to be a statement on existing empty homes strategies.

Para 6.6 – The HBF do not recall the London Plan making an allowance for second homes when setting the overall housing target. It is inevitable that a proportion of the population in London will choose to live in the city during the week and then live elsewhere at the weekend. How does the GLA view this arrangement in terms of whether the second home is in London or beyond London? Are the GLA saying it wishes to prevent this trend? If so, we would seek greater clarification of this as it could severely disrupt the quantity and quality of the labour supply in London. Similarly, if London is to maintain its status as a world city, then non-permanent visitor accommodation will occur. We doubt whether this affects a significant proportion of the housing stock to the extent that it fuels local house price to any great extent.

Para 6.19 – We object to the aim that boroughs should resist development, which leads to either a net loss of housing or the replacement of affordable housing by market housing. Regeneration objectives within existing residential areas will benefit the introduction of mixed communities, in particular to regeneration projects seeking to improve neighbourhoods that are dominated by single tenures, the South Kilburn New Deal for Communities project being a typical example. This also runs against the grain of the Government's goal of the creation of mixed and balanced communities.

Section 7 – Sources of Supply – Large Sites

This section on large development sites appears to be crossing over into different matters of a substantive nature, in particular infrastructure provision. This is clouding the overall purpose of this SPG and should be considered separately.

Para 7.10 - As stated in our response to Paragraph 6.19, any loss of affordable housing in estate renewal has to be balanced against the creation of mixed and balanced communities, regeneration initiatives and efforts to combat social exclusion. It is imperative that the Mayor weighs up the long-term benefits of a sustainable community against overall regeneration objectives.

Estate Renewal

The SPG is not clear how it is going forward with estate renewal. Is the SPG saying that a balanced approach to estate renewal and supply of affordable housing should be taken, weighing up the gains of estate renewal and balanced communities against the loss of affordable housing? The HBF referred to the South Kilburn New Deal project in the previous section. The GLA have objected to this project simply on grounds of loss of affordable housing. The HBF believe a more balanced approach to estate renewal should be vindicated through this SPG.

Section 8 – Sources of Supply – Small Sites

Residential Conversions

This section is purely descriptive and does not actually offer any supplementary guidance.

Para 8.7 – It is unclear as to why infill sites should be distinguished between those that may be developed in the short-term and those, which require a longer time scale to bring forward.

Section 9 – Promoting Mixed Use Development

Para 9.1 – This SPG does not provide a consistent line between maximising housing capacity, encouraging residential development close to public transport nodes and then promoting self-containment through mixed-use development. Whilst the value of mixed-use development is recognised, it is important not to prejudice residential development projects, for example by seeking commercial uses at ground floor level where the long term demand and commercial viability of the commercial uses are uncertain. This simply results in vacant ground floor units and the development becomes unsightly.

Para 9.16 – Surely the SPG should be making reference to revised Para 42a of PPG3 relating to the re-use of employment land. This is likely to influence the re-development of these sites. In addition, the development with mixed-use are now enabling the redevelopment of employment sites in a manner that retains employment levels as well as generating additional housing.

Section 10 – Housing Choice and the Needs of London’s Diverse Population

As stated in our overview of the SPG, since its publication for consultation, the Government have issued a revised PPG 3 Consultation entitled “ Planning for Mixed Communities” this proposes the undertaking of Local Housing Assessments in order to assess:

- *“the number of current and anticipated households by type;*
- *the current and anticipated household demand in terms of affordable and market housing, and what this would mean in terms of net housing provision, and where appropriate, levels of new build and clearance in some areas; and*

- *the particular accommodation needs of specific groups, such as key workers, homeless households, Black and Minority Ethnic groups, first time buyers, students, the disabled, older people and Gypsies and Travellers.*” (Paragraph 3, Planning for Mixed Communities, January 2005)

Para 10.2 talks of housing needs assessments and states, “ *Boroughs should therefore identify the mix of unit sizes they will seek (measured by number of bedrooms) for different types of housing.*” However, the focus and thrust of current Government thinking in the Revised PPG 3 consultation is very much upon ‘household types’ rather than housing types. Indeed the covering letter to the document states:

“...local planning authorities should plan for the range of different households likely to need housing over the plan period and not for a range of size and type of housing based on floorspace or numbers of rooms.”

This is a significant change in approach and conflicts with Policy 3A.4 of the London plan, which refers to boroughs identifying the full range of housing needs within their area. This requires a much less prescriptive approach to housing provision than is proposed within this SPG.

Whilst the final sentence of Para 10.7 states that the proportions set out in Para 10.3 are “*meant to inform more detailed local housing requirement studies,*” Paragraph 6 of “*Planning for Mixed Communities*” states that Regional Spatial Strategies should “*not seek to prescribe the detail of policies which are properly the responsibility of local planning authorities.*” The HBF consider that the inclusion of ‘top-down’ figures in Para 10.3 of this SPG, which can be interpreted as prescription, undermines the Borough’s undertaking of Local Housing Assessments, and subsequent identification of “*the broad balance between the different household types*”, as described in Paragraph 7 of ‘*Planning for Mixed Communities*’.

Whilst Paragraph 10.4 of the SPG states “*the proportions however set a useful background to local housing needs requirements and housing market studies*”, these should be submitted to inform Local Housing Assessments, in the preparatory stages reflecting the GLA’s role as one of a number of stakeholders, not in this SPG where they are superfluous and will cause confusion. The SPG acknowledges that these figures will vary widely between local areas. We would request that Para 10.3 is deleted and subsequent text is changed accordingly.

Para 10.6 – that the study does not reflect the fact that consumption of housing in the private sector is not based upon household requirements is a fundamental flaw. The study dismisses the role of larger private sector housing.