

## **FURTHER ALTERATIONS TO THE LONDON PLAN: THE PANEL'S REPORT ON THE EXAMINATION IN PUBLIC**

### **Introduction**

On Tuesday 9<sup>th</sup> October the Panel published its report on the Examination in Public (EiP) on the Further Alterations to the London Plan (FALP) conducted in June and July 2007.

The Panel's report provides a strong endorsement of the Mayor's objective to encourage both more affordable and greener homes across London.

The report can be sourced at:

<http://www.london.gov.uk/mayor/strategies/sds/further-alt/docs.jsp>

A summary of the headline issues for Members is provided below.

### **Overview**

The report has come out strongly in favour of the Mayor's approach to delivering more affordable housing by supporting the lowering of the threshold to trigger affordable housing from 15 to 10 units (pp.153-160).

The Panel has also delivered a very 'green' report, endorsing most of the Mayor's challenging environmental targets, and in one or two places even exceeding the London Plan targets (e.g. the target for CO<sub>2</sub> reduction, see para.1.54, p.22). In short, the Panel believes that developers are able to absorb the challenging targets for the delivery of on-site renewables, cutting carbon dioxide emissions, meeting the *Code for Sustainable Homes*, mitigating flood risk and other environmental measures, without affecting profitability and housing delivery. Indeed, the report believes that developers should be 'stretched' to ensure that they invest in the innovations necessary to achieve the various stages of the Plan's environmental targets in the next 10-15 years.

Flexibility to negotiate over whether a particular energy reduction measure is feasible or viable on a site has been reduced. Instead of using terms such as 'where appropriate' the Panel has recommended using the word 'presumption' to imply that these measures will automatically be provided by developers, unless a developer can demonstrate that a measure would be unsuitable (para. 1.70, p.27).

## **Timetable**

A conversation with the Government Office for London suggests that the Mayor will wish to move swiftly towards publication of the Further Alterations report before the Mayoral elections in May 2008. He will therefore want to quickly publish his 'Intend to Publish' Plan to allow the Secretary of State at least six weeks to comment and, for the Mayor then to respond to any directions made by the Secretary of State. The Further Alterations will then be published before the Assembly goes into purdah in March 2008.

Procedural Note: the process in London is different from that governing the adoption of other Regional Spatial Strategies where there is a further phase of public consultation on any Modifications as part of the 'Intention to Adopt' phase. In London, no further public consultation is required: the Mayor need only to consider the Panel's report and any directions made by the Secretary of State.

## **Headline issues**

### **Affordable housing: site threshold**

The Panel has endorsed the Mayor's approach to delivering more affordable housing by supporting the lowering of the site threshold from 15 to 10 units (pp.153-160). The reduction was justified by the Mayor, with the Panel agreeing, on the grounds that nine London Boroughs already operated a threshold of 10, and 19 had set thresholds of 15 (para. 6.57, p.154). It was also argued, that such a policy was necessary given the relative shortage of large sites in London suitable for residential development compared with the availability of small sites. The proposed change in policy was also justified by the Mayor on the basis of there being a 'confusing and inequitable' distribution of affordable housing in London (para.6.57). The Government Office for London (GOL) were non-committal on the matter, preferring to leave the issue to the EiP and Panel to consider, even though it did draw attention to PPS3 which does not require thresholds to be set out in Regional Spatial Strategies.

The Panel agreed with the Mayor, based upon evidence from the earlier Three Dragons study, that a threshold lower than 10 units would be unviable, but a threshold of 10 was achievable in London "without choking off the overall rate of housing delivery" (para. 6.66, pp.155-6).

The Mayor's response to the argument advanced by the HBF and others in the development industry that this would make development unviable and reduce the number of homes built, was that nine Boroughs were already successfully operating the threshold. In all but one of these the policy had had no impact on housing delivery, and the Boroughs concerned were actually exceeding their housing targets. The Panel dismissed the argument put forward by the HBF and others as "assertion" unsupported by evidence (para.6.68, p.156).

The Panel has recommended that low cost market housing should not be included within the definition of affordable housing, in line with PPS3 (para.6.71, p.156).

### **Housing mix and density**

Concern was expressed at the EiP that high densities were precluding the construction of family-sized housing. The HBF argued that that density policy should not control the size and type of market housing. The Panel acknowledged that housing mix fell beyond the parameters of the density debate and saw no need to change the FALP in this regard.

However, the Panel was sufficiently concerned about this issue (despite no fresh evidence presented on the matter) to support the Mayor's view that this question could be addressed by focussing on rooms per hectare as a measure, rather than homes per hectare (para.6.37, p.150). It supported the Mayor's view that the "form of housing output should be determined primarily by an assessment of housing requirements and not by any assumption as to the built form of the development". The Panel has recommended that this sentence be incorporated in paragraph 3.15iii.

### **On-site renewables (the Merton Rule)**

The Panel supported the Mayor's target of doubling the provision on on-site renewable energy from 10% in the current London Plan to 20%. The Panel applauded the Mayor's commitment to tackling climate change and was dismissive of the arguments of developers that this would make housing and business development unviable, regarding this as a "pessimistic prognosis" (para.1.29, p.15). It cited the Draft PPS Supplement on Climate Change that argued that developers are capable of adapting to the additional requirements of the PPS without a material increase in construction costs (para. 1.29, p.15) but it also cited evidence suggesting that setting targets for on-site renewable was having an effect. It concluded that setting 'stretching' targets for developers was the only way to achieve progress (para. 1.29, p.15). Moreover, the Panel concluded, costs were already reducing, and would reduce further as measures were adopted on a larger scale.

The Panel also agreed with the Mayor that there were potential benefits for London in embracing change in this arena, as 'green credentials' were likely to influence increasingly the location of international companies and it would enable London to become a "dominant centre for carbon emissions trading".

The Panel also clarified that the 20% target was meant to apply to the development's residual energy requirement, over and above any savings made from the design and construction of buildings. This would mean that this policy would not compete with Part L of the Building Regulations (para.1.59, p.24).

The feasibility of the 20% target was supported by a report by South Bank University. Interestingly, the Panel expressed reservations about this report, and also one by Arup, because of the limited number of case studies they drew upon, and the narrow range of type and size of development (para. 1.64, pp.25-26).

### **Flexibility over the provision of on-site renewables**

The Panel recognised the need for flexibility, but argued that this could be achieved by the use of the term ‘presumption’ – a presumption that the target of 20% will be achieved *unless* the developer could demonstrate that this was either unfeasible or unviable (para. 1.70, p.27).

### ***The Code for Sustainable Homes***

The Panel has upheld the view in the FALP that the Code should be dealt with through planning, and not left as a matter for the Building Regulations, since these were issues that needed to be considered ‘upfront’ and not left to the point where effective action is more difficult to achieve (the problems of retro-fitting).

The Panel therefore recommended that Policy 4A.2i be amended to include:

“Promote energy efficiency standards for new homes equivalent as a minimum to Level 3 of the Code for Sustainable Homes by 2010, Level 4 by 2013 and Level 6 ‘zero carbon’ by 2016.”

### **Targets for reducing CO<sub>2</sub>**

Policy 4A.2ii sets out targets for reducing CO<sub>2</sub> :

15% by 2010  
20% by 2015  
25% by 2020  
30% by 2025

The HBF and others felt these targets should not be included within policy, but the Panel disagreed and so they will remain (para.1.54, p.22)

### **De-centralised energy infrastructure**

The Panel called on Local Planning Authorities(LPA) to plan for de-centralised energy supply, and for developers to connect-up to this infrastructure.

A new Policy is proposed calling on LPA Local Development Documents to “identify and safeguard existing heating and cooling networks and maximise opportunities for providing new networks that are supplied by decentralised energy.”

## **Housing delivery trajectory (PPS3)**

London Plan policy will be amended through the FALP to reflect the requirements of PPS3. The Panel urged the Mayor to bring forward its assessment of housing need and land supply and to publish this before 2011 if possible.

## **Summary**

### **Chapter 1: Climate change**

The Mayor has a statutory duty in respect of climate change (Circular 1/2000). No one type of renewable energy production to be favoured – a flexible approach will be taken to accommodating changes in technology.

#### Code for Sustainable Homes

The FALP was drafted and the examination took place before the publication of the Government's 'Green Package' (PPS1 draft supplement; CSH; Building a Greener Future), even so, the panel concluded that there was sufficient conformity between the FALP and the Government's guidance.

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The Panel therefore recommended that Policy 4A.2i be amended to include:

"Promote energy efficiency standards for new homes equivalent as a minimum to Level 3 of the Code for Sustainable Homes by 2010, Level 4 by 2013 and Level 6 'zero carbon' by 2016."

CSH upheld as the principle standard and this will be clearly referred to in the FALP (p.13). The panel, and therefore the FALP, regard the levels set by the Code as only the 'minimum' standards to be achieved.

Detailed policy on implementation is to be confined to SPG. SPG is to be redrafted to fall into line with the CSH (p.13).

The FALP will promote energy efficiency standards in new homes to a minimum of CSH Level 3 by 2010; Level 4 by 2013; and Level 6 by 2016 (p.13).

#### Definition of Major Development

The Panel has recommended that the definition is changed in line with the one proposed by the Mayor (p. 14) but this still needs to be negotiated with the GOL.

The definition proposed, contained in the glossary, reads as follows (note there are two definitions of 'major development' in London: Strategic developments and Borough level developments):

### 1. Strategic Developments (applications referable to the Mayor)

The planning applications that must be referred to the Mayor according to Parts I - IV of the Town and Country Planning (Mayor of London) Order 2000. Examples include 500 dwellings, 30,000 sq m commercial space in the city, 20,000 sq m and 15,000 sq m of commercial space in and outside Central London respectively.

### 2. Major Developments (applications decided by the London Boroughs)

The definition adopted by boroughs should be that currently used by the Government's PS2 form that each district planning authority must use to report general developments.

Major Developments be defined as:

- For dwellings: where 10 or more are to be constructed (or if number not given, area is more than 0.5 hectares).
- For all other uses: where the floor space will be 1000 sq metres or more (or site is 1 hectare or more). Area of site is that directly involved in some aspect of the development. Floor space is defined as the sum of floor area within the building measured externally to the external wall faces at each level. Basement car parks, rooftop plant rooms, caretakers' flats etc. should be included in the floor space figure.

### The cost of compliance

Will compliance make business and housing development unviable? The Panel did not accept "this pessimistic prognosis". In part, because it accepts the view of the Draft PPS on Climate Change that developers are capable of adapting to the additional requirements of the PPS and will not represent a material increase in construction costs (para. 1.29, p.15) but evidence also suggests that setting targets for on-site renewables is having an effect. Setting 'stretching' targets is the only way to achieve progress.

'Green credentials' are also likely to attract companies to locate in London and make London a dominant centre in carbon trading. Economies of scale will also reduce costs in the medium to longer term.

The Mayor argued that mitigation measures must be seen as essential and the Panel supported this 'mind-set'.

## Flexibility

The Panel regarded arguments by those seeking greater ‘flexibility’ in how and where renewable energy should be provided (i.e. where appropriate or viable) as “an exercise in finding reasons to take no action” (para. 1.31, p.16). London ought to set an example for the world in pioneering energy efficient technology.

The Panel regarded the call for unspecific targets as a “recipe for uncertainty and obfuscation” (para. 1.32, p.16). The GOL support this approach. Nevertheless, the Panel recognises that there will be cases where compliance will be difficult or impossible (para. 1.34, p.16). Policy 4A.15, para 4.4i allows a degree of flexibility. It states that: “the fullest and most appropriate contributions can be identified in the context of each particular proposal”. This may allow room for a lesser contribution where circumstances dictate, as the Panel suggest, but to this reader, the word ‘fullest’ suggests an expectation that some sort of contribution will be extracted from each site.

In view of the uncertainty this might create, the Panel has recommended including the term ‘presumption’ in favour of mitigation measures. Thus it has recommended that Policy 4A.5i is amended to reflect a presumption in favour of meeting mitigation targets (p.17). Thus it has recommended that the following addition be added to para. 4.4i, after the second sentence:

*“There will be a presumption that the targets will be met in full except where developers can demonstrate that in the particular circumstances of a proposal there are compelling reasons for the relaxation of the targets.”*

## Energy hierarchy

The energy hierarchy gives pre-eminence to first reducing consumption, then supplying energy efficiently, followed by using renewable energy. This is to be made more prominent, placing an emphasis first on sustainable design and construction methods – e.g. achieving energy savings through the design and construction of the building envelope (Policy 4a.2i) and then by prioritising decentralised energy supply, followed by renewables.

## Targets for reducing CO<sub>2</sub>

Policy 4A.2ii sets out targets for reducing CO<sub>2</sub> :

15% by 2010  
20% by 2015  
25% by 2020  
30% by 2025

The HBF and others felt these targets should not be included within policy, but the Panel disagreed and so they will remain (para.1.54, p.22).

### Mitigation – on-site renewable target

The FALP requires developments to deliver a reduction in CO<sub>2</sub> by 20%. A study commissioned from South Bank University concluded that this was feasible. The 20% reduction is meant to apply to the developer's residual energy requirement, over and beyond the savings to be made from the design and construction of buildings (thus this policy would not compete with Part L requirements).

The Panel argues that the Draft PPS1 supplement calls on LPA DPDs to set out policies for on-site renewables and in para. 1.11 and a footnote on p.22 it proposes a 10% target. This would not prohibit setting higher targets (p.24).

Despite the arguments of the HBF, which felt this should be a matter left for the boroughs to determine on a site by site basis, but many others felt that a standard target, applied consistently across London, was required (p.25). The Panel believed this would provide certainty for developers.

The GOL argued that while technical innovation was supported, this should not place obstacles in the way of development and place undue burdens/costs on developers (para 1.63).

### South Bank University/Arup reports

Interestingly, although the evidence presented by these reports helped underpin the decision to support the 20% target, the Panel expressed reservations about both reports, citing the small number of case studies (p.25-26).

### Flexibility

The Panel recognised the need for flexibility, but this could be achieved by the use of the term 'presumption' – it should be presumed that the target of 20% be achieved unless it can be demonstrated this is either unfeasible or viable (para. 1.70, p.27). The onus would be on the developer to demonstrate this.

The Mayor may wish to set out in the SPG the circumstances of where the target might be considered unfeasible or unviable. Even so the Mayor should not build in too much flexibility that would allow developers to evade this target and to develop innovative solutions.

### Fund idea

Some participants suggested that developers pay-in to a fund to pay for on-site provision. The Panel has recommended that this idea should be explored further.



### De-centralised energy infrastructure

The Panel called on LPAs to plan for this, and for developers to connect up to this infrastructure.

A new Policy is proposed calling on LPA LDFs to “identify and safeguard existing heating and cooling networks and maximise opportunities for providing new networks that are supplied by decentralised energy.”

### Adaptation – general response

The Mayor wishes to prioritise moves towards passive building construction – he was critical of those organisations representing commercial development (London First and BPF) who said that air-conditioning was an essential feature for offices (the Panel agreed with the Mayor that “it was wrong to change policy to allow for the wishes or conventions of the development world.”).

### Living roofs and walls

The HBF had been concerned by the costs associated with this but the Panel has decided to introduce a new Policy:

“The Mayor will and Boroughs should expect major developments to incorporate living roofs and walls where feasible and reflect this principle in LDF policies...” (p.37)

### Flood risk management

The Panel recommended redrafting Policy 4A.5vi in the light of the publication of PPS25 to read:

*“Where development in areas at risk from flooding is permitted (taking into account the provisions of PPS25), the Mayor will and the Boroughs and other agencies should manage the existing risk of flooding, and the future increased risk and consequences of flooding as a result of Climate Change, by:*

- *protecting the integrity of the existing flood defences;*
- *setting permanent built development back from existing flood defences to allow for the management, maintenance and upgrading of those defences to be undertaken in a sustainable and cost effective way;*
- *incorporating flood resilient design; and*
- *establishing flood warning and emergency procedures.*

*Opportunities should be taken to identify and utilise areas for flood risk*

*management, including the creation of new floodplain or the restoration of all or part of the natural floodplain to its original function, as well as using open space in the flood plain for the attenuation of flood water.”*

The Panel also recommend the inclusion of the changes to paragraphs 4.30iii and iv as proposed by the Mayor in BN16D, as follows:

*“Reduction in flood risk can be achieved through appropriate location, design and construction of development and the sustainable management of surface water run-off. Boroughs, either individually or collectively, will produce Strategic Flood Risk Assessments. Developers should determine, in consultation with the Environment Agency or the relevant borough, whether their proposed development site is at flood risk. Developers seeking to develop a site at flood risk should undertake an appropriate flood risk assessment. All flood risk management proposals should avoid Increasing flood risk to neighboring areas.”*

(See pp.40-41).

#### Water use targets

The Panel supports the Mayor’s target of 105 litres per person per day in homes, but has recommended amending this target in line with the CSH level 5/6 target of just 80 litres by 2016. Developers will need to think about providing for greater grey water use (p.50).

### **Chapter 3: Inter-regional issues**

#### London-Luton-Bedford corridor

This issue was controversial. Barnet, Brent, Harrow and Camden and London First, London councils and NLSA and ALBPO supported its retention in the plan: nodal development was already taking place and therefore needed to be managed well. It would benefit London residents. This was opposed by others who argued that the policies affected land beyond the boundary of London (pp.75-76), but the Panel supported the idea of ‘Growth Areas and Co-ordination Corridors’.

The other Growth Areas were discussed. Issues rested mainly on issues of coordination.

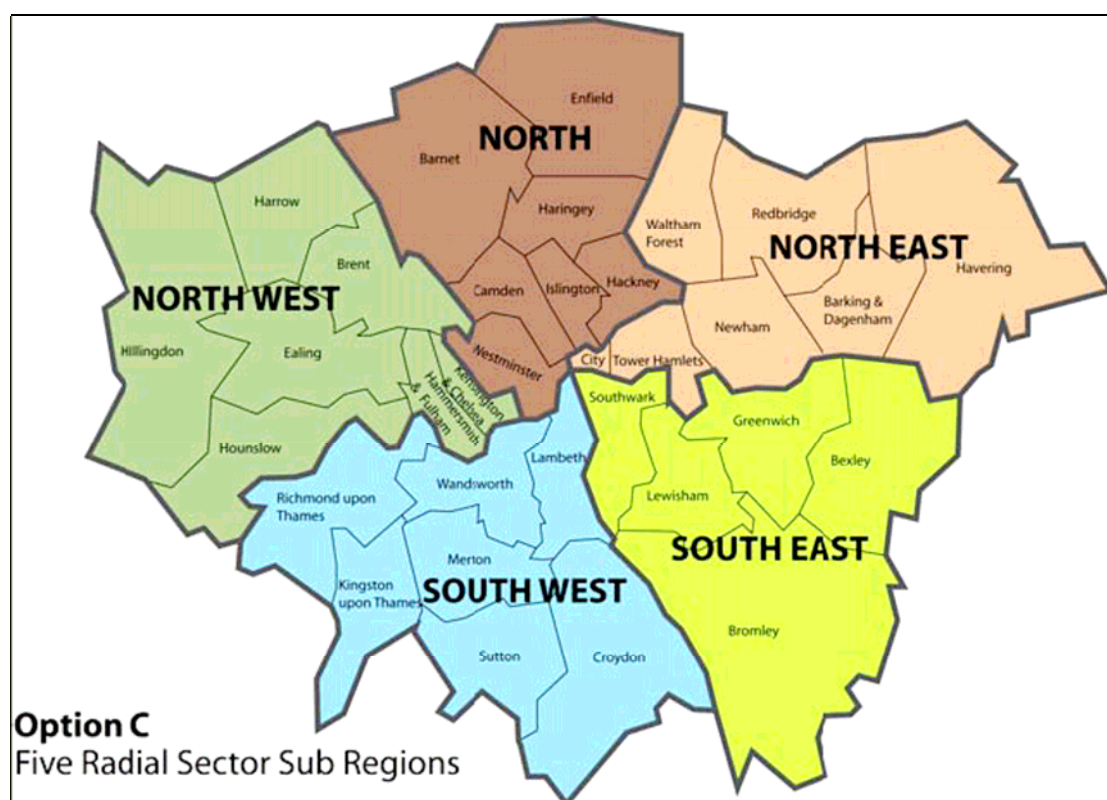
### **Chapter 4: Sub-regional structure**

#### Sub regions

A new sub regional structure is proposed. See figure below.

A revised and enlarged Central Activities Zone would overlay the innermost areas of each of the sub regions but will no longer exist as a formal entity. The Panel recommended these changes subject to mechanisms being put in place to encourage and facilitate cross sub-region coordination (p.96).

### The newly proposed sub-region structure



## Chapter 5: Designated localities

### Central Activities Zone (CAZ)

The Panel has recommended that this sub-area retains the description used in the 2004 Plan of “Mixed uses with a strong arts, cultural or entertainment character”.

### Residential areas in the CAZ

Considerable fears were voiced at the EiP about the impact of development on the amenity of residential areas in the CAZ. The Panel supported the Policy 5G.5: to maximize provision of housing but in ways that will not compromise the achievement of other objectives (amenity). In the face of objections, the Panel argued that no single policy area can be accorded primacy over other objectives of the London Plan (p.106).

## Outer London and the suburbs – ‘suburban heartlands’

The Panel saw no case for defining a new Policy to protect ‘suburban heartlands’ (leafy, low density) from intensification. As the report states: *“London has to accommodate close to 1 million more residents over the next 20 years, and it would be unsustainable and inequitable for the Mayor in some way to privilege particular suburbs by, in effect, exempting them from contributing to meeting the capital’s future housing needs.”*

However, Borough UDPs and DPDs exist to control the character of development in such areas and these are deemed adequate. No carte blanche is given to harmful infilling. Conservation areas offer an additional level of protection (p.125).

## **Chapter 6: Aspects of Housing**

### The density matrix

The Panel recommended no change to the density matrix (para.6.17, p.146).

Concern however had been expressed during the EiP process about the application of the density matrix, if not against much the principle of high density development (para. 6.14). See more below.

The Panel supported the principle of locating high densities near public transport accessibility (para. 6.15, p.146). GOL supported the density matrix (para. 6.16). Many regarded it as a useful tool.

### Flexibility and implementation

The Panel clarified that the matrix is intended to be “flexible and not prescriptive”. However, this flexibility was perceived in different ways by the housebuilding industry and by community groups (para 6.18). Developers favoured more flexibility in terms of both where it was applied and how far they could build under or over the indicative margins. As one said, the matrix “should not be treated as static but be used as one of many tools for increasing density solutions”.

The Panel, however, was concerned by the number of developments pushing at and over the upper levels of the matrix. The Mayor was aware of the issue and will offer further guidance to be incorporated in the Housing SPG.

### ‘Maximise’ or ‘optimise’?

Policy 3A.2i is entitled ‘Maximise the potential of sites’. This policy seeks to achieve a maximum intensity of use subject to the usual caveats about consideration for local context, design and local transport capacity.

There was a concern expressed at the EiP that this was driving up densities; a view countered by developers who said that this was necessary to maximise the potential of sites to deliver the housing numbers required by Government. The Mayor argued that there were sufficient caveats and clauses in other policies to allow this to be moderated – the policy does not stand alone, but stands in the context of other policies which apply other criteria.

No change to the word ‘maximise’ was recommended. The Housing SPG, however, might provide more guidance on how this principle would be applied in future to avoid “*the excesses to which this policy might lead if untrammelled*” (para.6.26, p.148).

### Provision of social infrastructure

The Mayor believed that this was adequately addressed by other policies and that there should be no change to the FALP committing the Mayor to addressing additional and more sophisticated social infrastructure needs.

The Panel agreed, but felt in this instance though not in others, the Plan could cross-refer to other Policies seeking obligations to the provision of social infrastructure (open space, play space, etc).

### Housing mix

Mix was a contentious topic. Concern was expressed that high densities would prevent the construction of family housing.

There was no fresh evidence available to consider this question in detail, nevertheless, it did not stop the Panel from reprising some of the arguments, and giving little room for the HBF’s representations! The HBF is recorded as having made some “trenchant comments” although these are not rehearsed in the Panel’s report, unlike other organisations.

The Panel agreed that housing mix fell outside of the density debate and saw no need to change the FALP especially as these issues were addressed by other policies.

The Mayor also proposed to address this by focussing on rooms per hectare as a measure, rather than homes per hectare. This would enable housing output to be determined by an “assessment of housing requirements and not by any prior assumption as to the built form of a development” (para. 6.37, p.150). The Panel has recommended that this statement is included at the end of para. 3.15iii. It is unclear what the implications of this would be? Clearly house builders would welcome supply being responsive to market need, but is this an attempt by the public sector to control the market sector by stipulating the type of dwelling a household ought to occupy? Interestingly, this was Engel’s solution to the housing crisis of the nineteenth century (see *The Housing Question*, Friedrich Engels, 1872).

### Safeguarding character

PPS3 states that the density of existing housing should not be used to dictate that of new housing. London first commented on the way considerations of 'character' were used to frustrate development, but the Panel regarded this as a minority view. However, the Panel saw no grounds to give character a specific mention.

The Panel recommended that CABE/English Heritage guidance on tall buildings should be taken into account by LPAs.

### Affordable Housing

The Panel supported lowering the site threshold to trigger affordable housing from 15 to 10 units.

The use of the word 'normal' implies that this policy is not rigid. This complements Policy 3A.7 (unchanged) which refers to the need to apply policy flexibly, taking into account site costs, availability of subsidy etc. Paragraph 3.41 talks about the viability and the individual circumstances of the site. The Panel argue that it is important to read the policy in the light of these other statements (para.6.53, p.153).

The Panel considered whether it was legitimate for the Plan to contain such a threshold at all and whether it complied with National Policy. Furthermore PPS3 'does not require' thresholds to be set. The HBF argued that this should be determined at local level, but the Panel felt this was an inefficient "way of arriving at a coordinated policy across London" (para.6.61, p.155). The Mayor, however, has justified this on the basis of there being a 'confusing and inequitable' distribution of affordable housing in London (para. 6.57). GOL were non-committal, leaving the matter to the EiP to consider.

The Panel concluded that because London has relatively few large sites, but a large number of small sites, such a policy was necessary, and thus a genuine regional consideration. It argued that paragraph 28 of PPS3, while making no mention of thresholds, did not necessarily "preclude the inclusion of a threshold in principle".

The Panel accepted that special circumstances might apply, but it preferred to establish a policy from which departures could be possible, rather than allow one to evolve.

### Is ten the right level?

The Mayor argued that a threshold of 10 would boost affordable housing in London by 1,225 units per annum. The Panel felt that the great need for affordable housing in London pointed to the need for a threshold as low as possible: the Three Dragons study suggested that a threshold lower than 10 would be unviable (para. 6.66, p.156).

### Viability

The Panel dismissed the arguments of those objecting on viability grounds for offering no evidence, only assertion (para. 6.68, p.156). By contrast the Mayor produced figures which showed that in those Boroughs already operating threshold of 10 there had been no damaging effect on delivery (para. 6.69).

### Low cost market housing

The Panel has recommended that low cost market housing should not be included within the definition of affordable housing, in line with PPS3. The Panel has therefore recommended that references to low cost market housing in Policy 3A.6 should be omitted.

### Compliance with affordable housing targets

The Panel considered whether it was too easy to 'negotiate away' the affordable housing target of 50%. There was no direct evidence to support this, but the Panel reasoned that because the target was being missed by so wide a margin this implied that the policy was not rigorously applied. However, no change to the policy was proposed.

Some said that negotiation for off site provision was too easily secured. The Panel argued that this was a matter for implementation, but sites for off-site provision could be secured before agreements for this are reached.

### Compliance with PPS3

FALP was published before the release of PPS3 so full compliance was not possible. One area of divergence is PPS3's call for a 15 year supply of land whereas the housing figures in the Earlier Alterations to the London Plan only go up to 2017/17.

The Mayor proposes to address this by conducting a further review of supply in 2008/9. This will allow revisions to be tested through the EiP process and published by 2011. The Panel urged the Mayor to bring this forward sooner rather than later. Land supply would be considered as well as housing capacity. It would fully take into account the requirements of PPS3 and the Panel recommended that the Policy should be amended accordingly (recommendation 6.5, p.160).

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