

Response by London Forum to the GLA scoping paper for the next Strategic Housing Land Availability Assessment for London

- The SHLAA paper does not consider the potential for housing London's people just outside the GLA boundary whereas the London Plan has references on cross-boundary planning and liaison.
- The housing targets for boroughs should be updated by 2013, not two to three years later (i.e. 2015/16). We'll be a long way from the last census by then – indeed half way to the next one!
- We strongly support the intention to close the gap between need and supply, but are concerned that the NPPF has singularly failed to grasp that planning for housing in London cannot be one which is driven by the need to meet the demand in full, as it is outside London, but dependent on the ability to find the capacity.
- The analysis of housing delivery since 2004 which is to be conducted should assess how many dwellings were delivered compared with how many the sites should have had built on them if the sites had been developed in line with the London Plan density policy/density matrix.
- The London Forum would like to be on the Technical Sub Group.
- The London Forum supports a trend-based approach to small sites covering the period from 2000-2012, taking in the different phases of the economic cycle.
- The London Forum considers that the current system has failed to plan for anything but traditional housing, leaving student accommodation and accommodation for the elderly (C2) being neglected even though a more proactive approach to planning for these groups could remove pressure on the housing market in certain areas and, in the case of accommodation for the elderly, potentially free up larger housing units – it is the lack of choices that put pressure on the local housing market (student housing) or leads to an unwillingness to move on the part of the elderly. We need to plan for a wider choice for these groups.
- Whilst we agree that the borough targets should not be driven by the assumption that "garden land" will contribute significantly to the supply of housing, it should be accepted that some housing will come from this source. Individual boroughs should be allowed to decide what 'garden' land should be used to increase housing.
- On 'Garden Cities', the approach to the use of Opportunity Area land is still left too much to developers. Boroughs should 'get a grip' and ensure that this is not open season for tall buildings and densities in excess of the appropriate density range. We are concerned that this aspect of London planning is out of control.
- On 'Flats above shops', there are too many Outer London neighbourhood shops with only one or no flats above small parades. The potential for adding floors or redeveloping should be more strongly sought by boroughs, particularly as shops 'die'.