

Comment by London Forum (NLP EiP participant 1684) on suggested changes to Policy H2

The changes to the first paragraph of the text of Policy H2 A is supported.

The new wording of Policy H2 A 5) of “seek to achieve the targets” is welcomed, as it seems to respond to evidence at the NLP EiP by boroughs that the suggested targets for additional homes on small sites are not able to be achieved.

However, consideration of their evidence should result in reductions in the number for some boroughs in Table 4.2.

The changes to Policy H2 B 1) are supported, particularly the removal of the words “increases in residential density”.

The addition of the words “Where appropriate” to Policy H2 B 2) for preparation of site-specific briefs, masterplans and housing design codes are an improvement.

London Forum notes that Policy H2 B 5) applies ‘permission in principle’ only to “specific sites”. There should be a paragraph to explain that those are ones the local authority thinks are suitable ones.

Paragraph 4.2.2 refers to obtaining from small sites “market homes in more affordable price brackets” but there should be emphasis on obtaining low cost rent homes also.

The claim in paragraph 4.2.4 that “the small sites targets in Table 4.2 are informed by the 2017 London SHLAA” has been challenged by boroughs who claim not to have had the opportunity for discussion on the proposed methodology nor the realism of the targets. They claim the targets are not based on “trends in housing completions on sites of this size.”.

In the new Policy H2A A, the words “boroughs should apply a presumption in favour of development proposals for small housing development implies most small sites which does not accord with Policy H2 B 5) which states that the ‘presumption’ is only for “specific sites”. That applies also to paragraph 4.2A.3 which refers to the presumption being triggered.

In Policy H2A A 1), the proposal for infill development, if it occurs within the curtilage of a house, needs to have additional words about any adverse effect on neighbours as decision criterion.

Policy H2A B should have the words “where appropriate” after “codes” to accord with Policy H2 B 2).

In Policy H2A C the words “local character should evolve over time” duplicate Policy H2 B 1) and should be deleted.

The deletion of “to residential privacy, biodiversity or a safeguarded land use” for consideration of harm should not have been deleted.

In Policy H2A D, for locations to which the presumption in principle should not be applied, sections 7B) and 7C (for protected public spaces and for buildings over 30m) should not have been deleted.

Incremental intensification of existing residential housing within PTAL 3 in Policy H2A 1) and paragraph 4.2A.1 is not satisfactory as public transport accessibility, capacity and frequency in PTAL 3 is not reliably good enough for housing intensification and may result in more use of cars.

In paragraph 4.2A.5 it is **essential** that the words in red strike-through are restored. All developments in Conservation Areas must be considered against the content of the CA Appraisal and the CA Management Plan.

The content of paragraph 4.2A.8 is welcomed for achieving the required supply of family homes.

The words struck through in paragraph 4.2A 10 for rainwater attenuation should be restored.

The addition of affordable housing contributions from development of nine or fewer housing units in paragraph 4.2A.12 is supported and welcomed.

London Forum cannot understand the reasons for deleting the sections a), b), c) and d) of Policy H2 HA and they should be restored, probably in Policy H2A. Space standards, parking standards, and Agent of Change principles are too important to be ignored in development of small sites.