

London SHLAA methodology 2017

The following are the comments of the London Forum of Amenity and Civic Societies. The reference numbers given are those of the document.

Our key points are as follows:-

- The SHLAA should extend to 2044
- The 270,000 homes with permission should be profiled and action planned
- A balance is needed between use of space for homes and for businesses
- Too much industrial land is being lost
- There should be agreements with approvals for delivery phasing
- Land of all utility companies should be considered
- Opportunities should be taken for development land assembly
- Opportunity areas should have site allocations within them
- Densities above the top of the range should be rare exceptions
- The 1km assumption for local walking is too high
- The setting for District Centres is unrealistic
- Existing back-street town centre businesses must be protected
- OAPFs must plan for the space needed for infrastructure and community needs
- More reference and use should be made of the HTA 'Superbia' proposals
- Development of any sites in Green Belt or Metropolitan Open Land must be banned
- Air pollution and noise other than from aircraft must be considered as constraints
- Playground land and sports facilities for schools should be considered as excluded
- Clarification is needed for mega-flats sold to foreign investors left empty as investments
- Clarification is needed on offices converted to dwellings

1 - SHLAA Introduction

The 25 year period for housing capacity should extend to 2044 because the Mayor's replacement London Plan will not be adopted until 2019 according to the slide presentation supporting 'A City for All Londoners'.

1.2 Sources of capacity

London Forum is keen that the source of housing capacity that relates to the existing 270,000 home approvals is examined carefully for each major site. It is necessary to ascertain the reality of some schemes being built and the delivery rate of those that are likely to proceed. It is understood that the GLA has had an analysis performed of

approvals on the London Development Database. Publication of the results would be useful and provide better clarity for housing volumes from that category so that local infrastructure planning can proceed. Details of each application and those involved in the schemes resulting from that analysis cannot be published, clearly, but it would be useful to understand what types of homes and in what volume are likely and when from the approvals.

An indication of those that will have permission expiring in coming months and years should be understood by the boroughs and the GLA so that revised or new applications can be determined on the basis of recent policies and guidance published by Sadiq Khan.

Approved developments that are speculative to establish new land values for the owner but have no developer involved need to be examined to see if they are the most suitable developments for their location. Partnerships should be established with the land owner to achieve development where possible.

The SHLAA methodology would yield more meaningful results if such actions are taken.

Consideration should be given to dividing some allocated large sites for development so that sections could be built in parallel by different developers or used for complementary mixed use purposes and infrastructure. This is covered by the third bullet point of paragraph 1.7.

The category of potential sites should include all publically owned land including that of utility companies like National Grid, as in paragraph 3.19.

Small sites will become more important in future as they can give quicker delivery of homes and there needs to be more done to engage small and medium builders in those sites. That is relevant to the content of this SHLAA methodology in section 5 - 'Sources of capacity outside the large site system'.

1.3 Project timescale

The "various scenario tests" need to be explained. The retention of industrial locations and the provision of new workspace have to be considered together with the demand for additional homes, as the methodology indicates.

1.4 Background and context to the study

There is no basis for considering the suggested need for 65,000 homes annually without an analysis of the new SHMAA. If "indicative results" from the SHMAA will be available by March, it is important that they are published for comment on those and its objectively assessed housing need.

The "additional housing intensification in town centres" in the last bullet point of paragraph 1.7 has to be planned carefully against the need for additional business space in such locations to support the local economy and to reduce the need to travel to work. The adverse effect of the Government's permitted development rights for office conversion have to be taken into account.

1.8 Industrial land research

London Forum is critical of the way more industrial land has been lost in London that was intended by policies of the London Plan. Strategic Industrial Land (SIL) loss needs to be seen as a serious issue in assessing identified potential housing land. There may be opportunities to change use of areas within SILs and Locally Significant Industrial Sites (LSISs) but the introduction of homes in such locations is often unsuitable for their new occupants due to the existing industrial activities and can lead to the closure of any businesses that adversely affect the amenities of new residents. There should be a presumption against those impacts and the loss of more industrial land until it can be demonstrated not to be needed. The trend based scenario in paragraph 1.9 should be removed. The Industrial Land Demand Study should be made available to boroughs soon. It should help the SHLAA process but should not be left too late in the capacity analysis process.

The probability assumptions in section 4 of Table 6 for LSIS release seem too high, given the excessive loss of industrial land in recent years and the incomplete state of the Industrial Land Demand Study.

The study of intensification, relocating and grouping of industrial land (para. 10) is welcomed but care must be taken not to separate businesses from their suppliers, customers and collaborators.

The industrial land shown on 3.14 Figure 1 in the Lee Valley and in East London along the Thames should be considered carefully for release due to the opportunity of using the waterways for the transport of materials and goods, thus reducing road traffic.

1.12 Confidentiality

The aim not to publish 'potential' housing sites for the reasons given is understood and supported but there are conflicts with the existence of the London publically owned land web site and maps and the insistence of Government that borough make known small sites for Right to Build and other forms of cooperative housing delivery.

1.14 Call for sites

It is encouraging that the 'call for sites' exercise has provided an indication of

deliverability and phasing. It is hoped that such details will be carried into agreements and conditions in approvals granted rather than just let them be added to the 270,000 existing approvals.

2 - Density estimates

London Forum does not support a general rule (paras. 2.2 and 2.8) that densities in opportunity areas should be above the top of the appropriate range. The current London Plan has a Key Performance Indicator that only 5% of developments should be above the range applicable to the sites on which they are built. That limit would have to be increased considerably if all forty opportunity areas are to be developed without constraint on density. There is a likelihood that the result could be a failure to create sustainable neighbourhoods, demands for social infrastructure that could not be met, poor place making and adverse living conditions for new residents.

If carried to the edges of opportunity areas, developments above the density range specified in the London Plan could be overbearing on surrounding communities and harm views. There should be a steeping down of building heights near the edge of opportunity areas, as suggested in paragraph 2.12.

Opportunities should be taken by land assembly to deliver mid rise homes at a suitable density and to avoid unnecessary tower blocks proposed by developers who acquire small areas of land for maximum profit. The planning frameworks for opportunity areas should specify site allocations within them and that should determine the contribution they would make to the SHLAA.

The assumption for density purposes that people are prepared to walk one kilometer to the town centre (also in para. 4.5) is not reasonable. The distance would be measured 'as the crow flies' whereas walking routes would be longer.

The description of housing stock type for suburban locations in the table at the top of page five of 'All other areas' is not meaningful.

The aim to densify town centres is accepted but it does not seem correct to apply an urban or central location to all of them when they include very many district centres in London Plan Table A2.1 where transport is not always of a high frequency or capacity and infrastructure may be slow or difficult to deliver. Some of the district centres have a policy direction of 'low'.

Many areas behind the frontages of high streets accommodate a variety of small businesses. Intensification of town centres (para. 2.7) must not assume that they can be displaced without harm to the availability of services, jobs and opportunities for economic development. That should be identified in Town Centre Health Checks (para. 3.42) and suitable protection and development for business purposes planned before

assumptions are made about clearing such areas.

The same considerations should apply to the protection of businesses in railway arches, some of which have been evicted by TfL's development of such facilities. That is a comment for GLA London Plan team consideration rather than being relevant to the SHLAA methodology but the facilities such small businesses in those arches provide in terms of local services and infrastructure are important for making new housing development sustainable.

It is not reasonable to assume that every town centre which is in or near an opportunity area can accommodate the higher density to be allowed for opportunity areas (para. 2.10).

Paragraph 2.13 implies that it is intended that in this SHLAA there should not be large reductions in the initial densities for sites (70% had initial densities reduced in 2013). GLA officers will take into account "trends in approvals". London Forum hopes that will not result in the Mayor over-ruling boroughs on the capacity that a site can deliver because recent trends in approvals have shown too many decisions in favour of developments with housing density three times or more the expected density for their sites. The same concerns apply to the LSE density model update work described in paragraph 2.16 which will also use recently completed developments.

London Forum supports the ability in the SHLAA methodology for boroughs to amend the land use mix of identified sites and reduce the net residential site accordingly (para. 2.14). That should avoid more schools having to be built on Metropolitan Open Land.

According to paragraph 2.15, revised or new Opportunity Area Planning Frameworks are being produced which will raise the densities assumed in the last SHLAA and in the London Plan. It is important that those draft OAPFs are consulted upon to give local communities the opportunity to understand the implications. The OAPFs must plan for the space needed for infrastructure and community needs.

3 - Potential sites

The methodology proposed in this section is supported but there seems to be no consideration of the intensification of land use in developed areas that have been explored in the 'Superbia' proposals produced by HTA two years ago and examined by the last Mayor's Outer London Commission for implementation. They are an implied opportunity mentioned in the third bullet point of para. 4.5 but more guidance to boroughs is required on examining the possibilities.

An additional delivery constraint for sites to which those proposals could apply will be the willingness of existing owners of homes and businesses to cooperate in the intensification of the land they own. That needs further consideration and policy

development.

In other cases where areas other than social housing estates could be intensified, the reluctance of elected Councillors to implement unpopular compulsory purchases should be taken into account and the willingness of local communities to support change.

London Forum supports strongly and welcomes the ban on allocating for development any sites in Green Belt, Metropolitan Open Land, Nature and Scientific sites and protected public or private space. However, in the latter case the 'unsuitable' classification should apply to all such sites, not only ones identified on a borough proposals map.

The application of zero development probability on safeguarded wharves is supported but consideration should be given to the retention on canals of materials transfer stations that could be used for transport by water of deconstruction waste and building materials. It may be reasonable to create more such transfer sites, particularly on the Paddington / Old Oak canal which has no locks, for general movement of goods by water. That would reduce the development area of some sites.

Environmental constraints

The omissions as constraints for house building in Table 7 of air pollution and noise other than from aircraft are serious and should be considered by the GLA.

Delivery constraints

The 10% reduction in probability for development in areas of medium category where there is a lack of local infrastructure, as in Table 8, seems to be a crude constraint. It will depend upon what elements of infrastructure are missing and how and when the deficiencies can be dealt with. The same approach should be taken as for developments of public transport near to an identified site where the timescale and capacity are to be taken into account.

Potential options to overcome constraints - Table 9

The timescale for some of the mitigation and avoidance measures may not be as good as in 2013 because cuts in borough resources have become a more significant factor. Also, the items to be funded by development may be affected by CIL-free developments, Starter Homes and the requirement of the Mayor for 35% affordable housing in new developments.

SHLAA phasing periods

London Forum questions the assumption in the second bullet point of paragraph 3.30

that all sites with planning permission where development has not started will be completed by 2024. Some will be large sites where housing delivery is likely to be over a ten year period after building commences.

Potential/allocated sites with a 100% probability may also be subject to delays, as acknowledged in paragraph 3.31. It is hoped that the GLA now has now a better understanding of what prevents or delays commencement from the analysis it commissioned of the schemes with approvals capable of delivering 270,000 housing units.

Housing Targets

Paragraphs 3.32 and 3.33 do not indicate the process for examining reasons for deviation from the housing delivery expected in the three or five phases to be used for monitoring. It should be explained what will be done if expectations are not met.

Are mega-flats sold to foreign investors to be left empty as investments counted a delivery of homes for Londoners?

How are offices converted to dwellings considered for housing targets?
Most of them do not deliver the types of homes needed in the location.

Low probability sites

The playground land and sports facilities for schools (para. 3.34) should also be considered as excluded from consideration for SHLAA. Too much such land has been lost to non-educational development. London Forum does not support the encouragement in paragraph 3.35 for boroughs to build homes on school sites.

London Forum is not sure that civic buildings should be considered as zero chance of development. LB Housing is vacating its Civic Centre site for it to be developed for housing and building a more compact centre in the town centre. There may be opportunities for that to be done elsewhere, particularly if suburban civic centres have large areas of public open space and car park land, as Hounslow Council's did.

The opportunity for housing in redeveloped out of town retail sites (para. 3.40) will need to be considered against the restraints of inadequate public transport and social infrastructure.

Offices

Paragraph 3.43 states that "offices will be automatically considered as potential sites in the SHLAA system" but London Forum proposes that this is unwise. Office availability fell in Central London near to a critical level of only 3% after the permitted development

(PDR) diktats of the last Government for conversion of offices. Office space rentals rose significantly as a result, as RICS has demonstrated. The exclusions for considering office sites as potential for homes are inadequate in para. 3.43. Boroughs are already implementing Article 4 Direction to protect their local economy and work space for voluntary organisations and small and emerging businesses.

The economy of London and its contribution to the nation's GDP are too important for the proposals in this SHLAA methodology for considering office conversions or replacement to be implemented as described.

Estate regeneration schemes

London Forum supports estate renewal but only if the policies of Sadiq Khan are followed for no enforced evictions, homes provided for previous occupants, fair treatment of RTB leaseholders and engagement of the community in the estate in refurbishment plans. The type of any increase in dwellings obtained during estate renewal should be aimed at the unmet housing need of the area and that should impose additional constraints on the extra homes forecast to be provided.

Emerging opportunity areas (OAs)

The additional OAs suggested need evaluation for their PTAL and Infrastructure. For example, the Great West Corridor would need significant transport investment over a considerable timescale to make its potential be able to be realised. Those restraints and the local economic requirements must be clear before they are added to the SHLAA as additional housing opportunities.

For the London Riverside opportunity area and the Old Kent Road AAP (para. 3.14) there should be careful consideration of context and character which could limit density.

4 - Scenario testing

It is stated that the 2017 SHMA "will identify a higher level of housing need than the previous 2013 SHMA study". That is not yet clear although the failure over the last six years to deliver homes for rent that people can afford is relevant. It needs to be recognised that the delivery of market housing for sale has exceeded the targets set. The land identified by this SHLAA must be considered for its ability to deliver the types of homes Londoners need.

There is emphasis in the SHLAA methodology of opportunities for housing development that arise from rail and Underground developments (para. 4.3). No value is given to the unlocking of additional housing provision by improved bus, tram and light rail services. That needs more consideration.

5 - Vacant homes

It is stated in para. 5.8 that "Since 2004 the overall number of long-term vacant homes in London has reduced by half and now accounts for only 0.6% of the total housing stock". They are "a key Mayoral priority". London Forum expects the reasons for vacancies and the opportunities for availability or redevelopment on some such sites to be understood. There is no indication that is so. The exclusion of vacant properties from the SHLAA (para. 5.10) does not seem reasonable. Appendix B shows that there are around 1,000 long term vacant homes in each of nine boroughs and figures over 700 in several others.

The methodology should cover Air B&B properties for short term let which are increasing.

Submission prepared by:-

Peter Eversden, London Forum of Amenity and Civic Societies January 2017

<london_forum@blueyonder.co.uk>