

Subject: London Forum Response to DCLG Consultation on "Planning for the Right Homes in the Right Place"

From: Michael Bach <michaelbach@madasafish.com>

Date: 13/11/2017 11:45

To: Steve Quartermain <steve.quartermain@communities.gsi.gov.uk>

CC: Mark Plummer <mark.plummer@communities.gsi.gov.uk>, Lucy Seymour-Bowdery <Lucy.Seymour-Bowdery@communities.gsi.gov.uk>, <nico.heslop@communities.gsi.gov.uk>

Dear Steve,

London Forum Response to "Planning for the Right Homes in the Right Place"

The London Forum has responded to this consultation through the on-line response form, and considers that the proposed methodology does not provide a good way of defining objectively-assessed need in local plans on London. We have tried to focus on the particular implications for London, leaving its appropriateness to the rest of country to others. We have not commented on the "standardised methodology" as we consider that the process of defining need and capacity in London is well established and suits the capacity-based approach to reconcile need and capacity to reach the negotiated housing targets for each London borough. The DCLG figures for London do not add any real value to the current process in London.

The London Forum was excited at the prospect of a document with this title – Planning for the Right Homes in the Right Places – but sadly the title does not relate to the content of the consultation. There is nothing in the document that relates to getting the right homes in the right places. It does not assist in identifying the most appropriate locations for new housing, nor does it deal with the types of housing needed and nor, other than in passing, does it deal with the special needs of specific groups.

Changes to the NPPF and NPG

We were looking forward to what this consultation would mean in terms of possible changes to the NPPF. There is in fact little other than changes to Para 50 of the NPPF which needs expansion, as well as changes to the NPG. The issue of the "right location" is major omission from the NPPF and the NPG. We can only hope that this will be rectified in the proposed changes to the NPPF due by the end of this year.

In short, apart from the title, three references in the Ministerial Foreword, two references in the opening paragraphs and one relating to infrastructure (para 127), there are no references to getting housing in the right places in this document. In any other sphere this would amount to misselling.

Rather than increase the "process" content of the NPPF, most of the material in this consultation should be in the NPG. We would welcome adding a paragraph or two of policy to the NPPF on what may be the "right place" to introduce some policy content on the issue of the location and pattern of urban development and the issue of creating places not just housing estates.

Overall assessment

This document, therefore, is very disappointing, because:

- **it does not do what it says on the tin** – it is not about getting the right homes in the right places, there is nothing about what constitutes the "right places" – the most sustainable locations and patterns of urban development - and there is almost nothing about housing type and housing for specific needs;
- **it is all about process** – a short paragraph in the NPPF would be quite sufficient with a proposed "how to do it guide" in a separate document or the NPG; and
- **the one-size-fits-all approach, which might be appropriate to most of the rest of England, would be inappropriate in Greater London.** There is no acknowledgement that the Greater

London Authority, through the London Plan, and London boroughs through their Local Plans, are much more advanced in their consideration of planning for objectively-assessed need (OAN). Through the London Plan SHMA, and, more importantly following the London Plan SHLAA, it identifies minimum 10-year targets and annual monitoring targets for London boroughs after reconciling need and capacity at borough level.

- **there is no reference to the types of affordable homes for which LPAs should plan.** Only in paragraph 114 do the words appear "different types of affordable housing", but that is not amplified. Each type of affordable housing from social housing to shared equity homes should be defined and LPAs required to plan for each type.

Whilst the document refers to evidence of rising house prices being inversely related to the level of house building (para 24) we are pleased that it does not refer to simplistic economics that increased house building will bring down house prices – that is not how the real world works.

London Forum therefore considers that the proposed standardised approach provides little additional value to either the London Plan or London borough Local Plans and proposes that London should not be required to adopt the national template. Nevertheless, this approach may have merit in most of England outside London, although towns and cities which are tightly bounded and surrounded by Green Belt may have similar policy and physical constraints to development and a limited supply of brownfield sites.

We hope that any changes to the NPPF and NPG will explicitly recognise that London, with its more developed approach to assessing housing need and greater disaggregation of different housing types and the needs of specific groups, not only fully meets the need for specifying objectively assessed need but provides a vital step, through a capacity-based approach, to reaching a negotiated set of housing targets for each London borough.

We urge you not to apply the "standardised approach" to identifying objectively assessed need to the very different situation in London, which has developed its own bespoke approach that is most appropriate for regional spatial strategy. This should acknowledge both the GLA's strength in assessing both need and capacity and being able to broker housing targets for each London borough. It needs to recognise that objectively-assessed need is merely the first step to specifying housing targets.

We hope these comments will help inform the changes needed to the NPPF and NPG to deliver the policy and guidance that really does promote "planning for the right homes in the right places".

Michael Bach and Peter Eversden

London Forum of Amenity and Civic Societies

— Attachments: —

Response to 'Planning for the Right Homes in the Right Places'[1].pdf

77.9 KB