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| <b>Item No.</b>                    | <b>Classification:</b><br>Open | <b>Date:</b><br>January 26 2010  | <b>Meeting Name:</b><br>Executive |
| <b>Report title:</b>               |                                | Response to the Mayor's London Plan 2009 and the Draft Revised Interim Housing Supplementary Planning Guidance |                                   |
| <b>Ward(s) or groups affected:</b> |                                | All  |                                   |
| <b>From:</b>                       |                                | Strategic Director of Regeneration and Neighbourhoods  |                                   |

## RECOMMENDATION

That the Executive agree

1. The council's formal response to 'the Draft alterations to the London Plan 2009' and the 'draft revised interim Housing Supplementary Planning Guidance' as set out in Appendix A.

## BACKGROUND INFORMATION

### Draft alterations to the London Plan 2009

2. The Mayor's London Plan sets out an integrated economic, environmental, transport and social framework for the development of the capital over the next 20 – 25 years. This was open for public comment from October 13 2009 until January 12 2010. We have agreed that we would submit an officer comment by the deadline followed by a member comment. This is due to the short timescale of the consultation. There will be an Examination in Public in summer and autumn of 2010. This will be led by an independent panel who will review responses and decide on the issues and who will be invited to the Examination. The panel will write a report to the Mayor recommending changes to the draft Plan which the Mayor can accept or reject. Following this, the Mayor sends a final version of the Plan to the Secretary of State who decides whether any further changes are needed. The Mayor will then formally publish the plan expected in late 2011.

### Draft revised interim Housing Supplementary Planning Guidance 2009

3. The Mayor's draft revised interim Housing Supplementary Planning Guidance (SPG) provides guidance on the implementation of the existing adopted London Plan consolidated with alterations (2008). This is the London Plan that will continue to be the development plan until the adoption of the new London Plan in 2011/12.
4. The SPG will replace some sections of the Mayor's adopted 2005 Housing SPG (paragraphs 5.1-6.19, 17.1-18.20 and 9.7-9.8). The Mayor will also be producing a comprehensively revised Housing SPG to provide further implementation guidance on the draft replacement London Plan currently out for consultation.

## CONSULTATION

### Draft alterations to the London Plan 2009

5. The Mayor released the Plan for public consultation from October 12 2009 until January 12 2010. When finalised it will replace the current adopted London Plan 2008. The timetable for adoption is set out in the background.

## **Draft revised interim Housing Supplementary Planning Guidance 2009**

6. The Mayor released the SPG for public consultation until 5 February 2010. When finalised it will replace the sections set out in paragraph 3 of the Mayor's adopted 2005 Housing SPG. The Mayor does not set out a timetable for adoption.
7. Planning Committee will consider this response on January 19. Their comments will be provided for Executive as an addendum.

## **KEY ISSUES FOR CONSIDERATION**

### **Draft alterations to the London Plan 2009**

8. There are 5 very significant issues that we would like to raise to the draft alterations to the London Plan 2009:
  - As much as we would like to achieve the suggested housing figure of 2005 in the London Plan. We do not consider that this is possible. There are a number of reasons for this. These include the high level of small completions that may not be able to be continued forward. There are a large number of potential sites that could be developed, however in our experience from completion surveys we have found that a considerable number do not come forward for a wide range of reasons. It is not possible to take out specific sites, instead we would like the contingency for sites not being built increased. A considerable number of easy sites have been developed so the sites remaining become more difficult. We are currently in a recession therefore the next few years are likely to deliver less housing leaving a higher number of units to be delivered in the future years. We are suggesting that continuing our current annual target of 1630 is ambitious and we will be working with our partners and as a land owner to develop as many sites as possible to provide as many homes as possible in Southwark.
  - Although we support the provision of intermediate housing as an important aspect in providing homes in Southwark. The requirement for 60/40 social/intermediate housing increasing the level of intermediate housing by 10% would be very difficult to achieve. This is because in practice intermediate housing is very difficult to make work as there are few mortgage options. This is a nationwide problem that needs to be addressed at a national and London level. In addition reducing the level of social housing will reduce the provision of social housing to move people into homes where we are regenerating areas. This will have knock on impacts on Elephant and Aylesbury regeneration programmes. It will also reduce our capacity to provide affordable housing in general and to re-house homeless people.
  - The density zones should be left as broad boundaries rather than being split by Public Transport Accessibility Level. The addition of an arbitrary transport measure means that some schemes which would be in character with the local area in areas of good transport such as Wood dene, Silwood and Aylesbury could be too dense. These higher densities are necessary to make the schemes viable so that they can provide new homes and affordable and family homes which are essential to meet our housing and affordable housing targets.
  - A requirement for the replacement of 100% affordable housing would make redevelopment of some housing estates such as Wood dene, Silwood and Elmington unviable. This would prevent provision of new housing and affordable and family housing which are essential to meet our housing and affordable housing targets.

- A requirement for housing in the office locations as part of any additional floorspace is detrimental to the provision of employment in the central activities zone. There is no need to provide housing in the areas where we have clusters of offices and it does not make sense to require affordable housing in buildings where businesses would like a whole block of office provision. Mixed use blocks with housing and offices can work and should be allowed. However if a proposal is made for a development of offices with no affordable housing then this should be allowed to strengthen our clusters of good quality, desirable, well functioning offices.
9. There are other issues that we would like to raise to the draft alterations to the London Plan 2009:
- clarity about sub regions and guidance on areas within London.
  - a detailed review of youth unemployment and crime along with a London wide approach to provision of religious premises is required with a focus on social infrastructure.
  - The 10% wheelchair housing should not allow for adaptable units, they should all be built for use as wheelchair housing.
  - Student accommodation should provide affordable housing.
  - Old Kent road and the Central Activities Zone should be named as areas for green technologies.
  - The code for sustainable homes should apply to all homes and the 20% should be reintroduced as a policy requirement for renewables.
  - Further funding should be provided for the northern line ticket hall at the Elephant and Castle, the Cross River Tram and implementation plan for all transport schemes should be provided.
  - The lack of an implementation plan is a significant barrier to provision of comments as we need further detail on how the London Plan will be delivered.
  - Boroughs should be allowed to prioritise section 106 funds if they have a clear strategy.

### **Draft revised interim Housing Supplementary Planning Guidance 2009**

10. The SPG aims to provide further guidance on three elements of the London Plan 2008:
- We support the approach to set out that private garden land development can contribute to an area's character and local distinctiveness and needs protection in some cases.
  - Housing density and quality as addressed in comments on the London Plan.
  - Affordable housing targets as addressed in comments on the London Plan.

## **COMMUNITY IMPACT STATEMENT**

### **Draft alterations to the London Plan 2009**

11. The suggestions in our response would improve the quality of life for residents in Southwark. Negative impacts of not making these changes are set out in full in the response.

### **Draft revised interim Housing Supplementary Planning Guidance 2009**

12. The key impacts are around additional considerations of amenity and local character and provision of affordable housing. These would improve quality of life for residents and would be positive changes to planning guidance.

## **SUSTAINABILITY CONSIDERATIONS**

### **Draft alterations to the London Plan 2009**

13. The suggestions in our response would improve the quality of life for residents in Southwark. Negative impacts of not making these changes are set out in full in the response.

### **Draft revised interim Housing Supplementary Planning Guidance 2009**

14. The key impacts are around additional considerations of amenity and local character and provision of affordable housing. These would improve quality of life for residents and would be positive changes to planning guidance.

## **RESOURCE/FINANCIAL IMPLICATIONS**

15. There are no specific financial implications associated with this paper. The financial implications of any particular policy or strategy should be addressed as part of any specific proposal.

## **SUPPLEMENTARY ADVICE FROM OTHER OFFICERS**

### **Strategic Director of Communities, Law & Governance**

16. The Strategic Director of Communities, Law & Governance has been consulted in relation to the council's response to the draft alterations to the London Plan 2009 and considers that the substantive policy and legal implications have been adequately addressed in the body of this report.

### **Functions & Responsibilities**

17. Members of Planning Committee are requested to consider the council's response to the draft London Plan 2009 (Appendix A) and make appropriate recommendations to Executive pursuant to their function under part 3F, paragraph 6 of the Constitution.
18. Members of Executive are requested to approve the council's consultation response to the draft London Plan 2009 as set out in Appendix A.
19. By virtue of Part 3B: Executive Role and Functions, paragraph 24 under the heading of "General", it is the function of Executive to approve the council's response to consultation papers such as the draft alterations to the London Plan 2009. Members are therefore advised that they may approve the response proposed by officers in Appendix A subject to such further comments or responses as Executive deem appropriate.

## **BACKGROUND DOCUMENTS**

| <b>Background Papers</b>                  | <b>Held At</b>                        | <b>Contact</b>             |
|---|---------------------------------------|----------------------------|
| Draft alterations to the London Plan 2009 | Planning Policy Team<br>Tooley Street | Rumi Bose<br>020 7525 5471 |
| Draft London Housing SPG (2009)           | Planning Policy Team<br>Tooley Street | Rumi Bose<br>020 7525 5471 |

## APPENDICES

| No.        | Title   |
|------------|---|
| Appendix A | Southwark council's response to the draft alterations to the London Plan 2009 |

## AUDIT TRAIL

|   |   |                          |
|---|---|--------------------------|
| <b>Lead Officer</b>   | Anne Lippitt, Strategic Director of Regeneration And Neighbourhoods |                          |
| <b>Report Author</b>  | Julie Seymour, Head of Planning Policy                              |                          |
| <b>Version</b>  | Final   |                          |
| <b>Dated</b>  | January 15 2010   |                          |
| <b>Key Decision?</b>  | No  |                          |
| <b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / EXECUTIVE MEMBER</b> |   |                          |
| <b>Officer Title</b>  | <b>Comments Sought</b>  | <b>Comments included</b> |
| Strategic Director of Communities, Law & Governance                       | Yes   | Yes                      |
| Departmental Finance Manager  | Yes   | Yes                      |
| Executive Member  | Yes   | No                       |
| <b>Date final report sent to Constitutional Support Services</b>          |   | January 15 2010          |