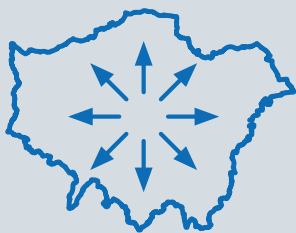


# Towards the New London Plan

December 2017

As the New London Plan moves into its public consultation phase some of the implications of new policy are beginning to be understood. We pick out some cross cutting themes that you might find helpful to mull over.



## Good growth

Mixed-use, co-location (of employment and residential uses) and intensification of use of land and optimisation of sites are all positive themes as is the strengthened role of our town centres as a focal point for services and facilities, for leisure and spaces to meet, for workspace but also as a location for high density residential. Our healthier, more accessible and more affordable city will be increasingly organised around walking, cycling and public transport. We will together create welcoming, attractive, resilient and integrated places.



## Move over supermarkets

Look for car parks, retail parks or industrial sites close to town centres in Zones 2-3. These are seen as key targets for more intensive use by adding residential accommodation (especially if served by a station), still retaining the existing occupiers (if needed), along with intensification of retail and employment uses above.



## Housing targets

The New London Plan sets ambitious housing targets for the next ten years and some of the outer boroughs in particular are facing a huge uplift; 23 authorities will see a rise in their targets and 13 of those will see their targets at least double.



## Focus of growth

We are told that as this growth cannot take place on the Green Belt, that as we are running out of inner urban brownfield land and that as CAZ must refocus on office / central functions the spotlight now falls on the suburbs, and their town centres, to accommodate most of the residential intensification necessary. Protection and intensification of existing employment land for mixed use is presented as a new key policy strand.



## Back to the old CBD model

Prioritising office and commercial in the very centre of London creates an interesting tension for delivering mixed use and genuinely diverse communities. Are we at risk of sterilising CAZ like the CBD of old or is this approach reasonable given residential affordability and occupancy issues?



## Deliverability

Will the abandoning of the density matrix be counterproductive and empower design and heritage based resistance where the outer boroughs cannot bring themselves to accept the profound scale shift necessary to accommodate this growth? Perhaps not a seismic change given that 50% of schemes exceeded the matrix densities anyway. Is the ambitious reliance on the role of small sites practicable and, even with co-location and layering, can we really deliver the housing of scale that we need if Strategic Industrial Land is not released.?



## Affordable housing

The Plan embeds the earlier Housing Supplementary Planning Guidance (SPG) in a validating primary policy context. New though, is the application of the 35% affordable housing threshold for Build to Rent. This can be discount market rent, of which at least 30% should be London Living Rent. The sector has long argued that the threshold approach is more challenging for the Build to Rent financial model and there isn't yet sufficient evidence to prove the 35% threshold is deliverable. Where it is possible to release industrial land expect to provide 50% affordable housing.



## Housing Mix

Encouragingly there is a move towards more flexibility and local discretion in dwelling size and mix with the emphasis on local authorities to understand their local need and properly reflect the role smaller units can play in terms of downsizing and freeing up family sized units.



## Design

Will the ramping up of design scrutiny through Design Review Panels of all referable schemes, including tall buildings, be too much for the nascent design review network to cope with? Will the challenge of providing detailed designs in all applications lead to the abandonment of outline applications and will this negatively affect the ability to bring forward major sites in a practicable way?



## Paradox of expectations

In this overall context of expectation we wonder whether there is a paradox at the heart of the Plan. Policy initiatives including air quality positive, zero carbon, car free, 40% site greening, 35% affordable requirements and the need to accord with character and context all challenge the very ability to intensify and optimise the use of London's land. Can all of these objectives be easily reconciled; indeed might 'Good Growth' end up being 'Not Much Growth'?

**We can help you answer these questions and develop smart strategies to inform investment and to mitigate emerging site specific risks. You may also wish to consider making representations in relation to new policies that more generally affect your interests. Please speak to us if you would like help in these respects. In the meantime the Plan has material weight already and needs to be taken account of in all planning decisions.**