

## Survey:

What is your name? Oliver Milne

What is your organisation (if applicable)? Savills on behalf of

Legal & General Property Partners

### 1. Which part of the Plan are you commenting on?

Policy:  Paragraph:  Table:  Map:

### 2. Do you consider the Plan is:

Legally compliant? Yes:  No:

Sound? Yes:  No:

### 3. If you believe the Plan to be unsound, is this because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

### 4. Please give reasons for your objection or support:

Please see covering letter for full comments.

As mentioned above, the proposed allocation for the wider LSIS (which includes the site) is welcomed by our client in principle. However, there still remains concerns with the indicative residential capacity and the requirement for supporting community facilities. These two aspects are addressed in more detail below.

#### *Indicative Residential Capacity*

The proposed allocation for the wider LSIS includes an indicative residential capacity of 200 dwellings. In the absence of more detailed information, this equates to 64 dwellings per hectare based on a site area of 3.14ha (i.e. the whole of the LSIS), or 182 dwellings per hectare based on a site area of 1.099ha (i.e. a plot ratio of 35%). We previously submitted representations to the Preferred Options version of the new Local Plan which stated that an indicative residential capacity of 200 dwellings is low given current and emerging planning policy and guidance, and runs the risk of not making efficient use of a key brownfield site as required by paragraph 122 of the NPPF and Policy H1 of the draft New London Plan.

In response to these representations we note that LBB officers have provided the following comments within the consultation responses documentation:

*“The indicative amount of residential development has been identified at an amount which at this stage in the absence of a fully designed scheme it is considered can realistically delivered on site. This takes into account the need to re-provide/ intensify industrial premises and potentially social infrastructure. It is proposed to make it clear that the indicative housing figures identified within allocations should neither be regarded as a minimum, which would take priority over other Local Plan policies, or a maximum which should limit numbers even if design solutions/ an otherwise acceptable scheme could deliver higher number of dwellings.”*

However, within the GLA's Stage 1 Report relating to the planning application on the neighbouring site (LPA Application Ref. 18/3498), we note that GLA officers stated that:

*“Taking into account the proportion of non-residential land uses proposed (28%), the application would have a density of 388 dwellings per hectare and 1,064 habitable rooms per hectare. In view of the PTAL of the site and the comprehensive mixed use nature of the development, this is acceptable.”* (author emphasis).

There is a stark difference between 182 dwellings per hectare (i.e. the resulting residential density based on 200 dwellings and a plot ratio of 35%) and 388 dwellings per hectare as accepted on part of the LSIS by GLA officers.

Whilst we acknowledge LBB officers' comments that the indicative capacity should neither be regarded as a minimum nor a maximum, this has not been made clear within the allocation itself. As currently worded, the allocation runs the risk of misleading Councillors and members of the public who may expect 200 dwellings (or close to) to be delivered across the wider LSIS. Given the planning application on the neighbouring site (which proposes 258 dwellings) and comments from GLA officers on this application relating to residential density, this is unlikely to be the case. It is considered that the current indicative residential capacity is un-justified which is contrary to the requirements of the NPPF.

Given the above, it is respectfully requested that the indicative residential capacity be increased to 300 and additional text be included within the allocation itself to state that this should not be treated as a maximum.

#### *Supporting Community Facilities*

The proposed allocation of the wider LSIS includes a requirement for supporting community facilities. We previously submitted representations to the Preferred Options version of the new Local Plan which stated that the provision of any supporting community facilities should only be required if there is an identified need within the local area taking into account other sites with capacity (which might be more appropriate) and any other facilities which are delivered in the future.

In response to these representations we note that LBB officers have provided the following comments within the consultation responses documentation:

*“In relation to social infrastructure needs on site, the council is aware for the need to reasonably relate these to the impacts of additional development.”*

No evidence of this 'need' has been provided within the officers' response. We therefore do not think that this aspect of the draft new London Plan is 'justified' as required by paragraph 35 of the NPPF. We still maintain that such facilities should only be required if there is an identified need within the local area taking into account other sites with capacity (which might be more appropriate) and any other facilities which are delivered in the future. It is respectfully requested that this is reflected within the wording of the proposed allocation.

5. What change(s) do you consider necessary to make the Plan legally compliant or sound?

Please see above.

6. If your representation is seeking a change, do you wish to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

7. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Due to our client's freehold interest in the site allocation.

**If you would like to comment on additional policies, please fix another sheet to this.**

To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the plan. The LPA will therefore ensure that the names and addresses of those making representations can be made available and taken into account by the Inspector. The Council, its appointed Local Plan Programme Officer or the Planning Inspector appointed to undertake the Examination may also contact you regarding your response.

- Please indicate if you wish your personal data to be used for reasons other than identifying your representation and being contacted in relation to that representation.