

## Brethren's Gospel Trusts in London

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London Plan – Draft Further Alterations – January 2014

### Comments on the consultation draft FALP

#### **Introduction and Background**

- a. Brethren's Gospel Trusts (BGT) represents charitable Gospel Hall Trusts and Education Trusts associated with long established Christian assemblies in several London Boroughs. In some cases Gospel Hall Trusts are seeking to dispose of surplus premises and land holdings and are engaged with Borough planning authorities to explore alternative uses or redevelopment opportunities. Local Gospel Hall Trusts have and continue to participate in Borough Local Plans.
- b. BGT primary objectives are to focus on:
  - the role of the voluntary sector in general and faith communities in particular in supporting the quality of life in London, in tackling social exclusion and inequalities, including crime and the fear of crime;
  - the need to maintain a clear marker for Local Plan preparation in London of the need to promote truly sustainable communities and to encourage diversity and equality in planning;
  - the need to retain provision at the London Plan level for the voluntary sector including faith communities and their need for space to operate and specifically to ensure the recognition of Places of Worship as part of the infrastructure for sustainable communities throughout London.
- c. BGT are also aware of the social consequences of the existing and forecast increased population in London and the need to continue to plan for an adequate supply of homes for a variety of needs including family homes throughout London through the plan period.
- d. BGT have previously participated at the London Plan EIP and continue to engage with the planning system at national and local levels. We are therefore grateful for the opportunity to comment on the draft Further Alterations to the London Plan.

- e. As was concluded by the Inspector who examined the Revised Early Minor Alterations to the London Plan<sup>1</sup> we submit that the FALP should be assessed against the advice of the National Planning Policy Framework (NPPF) paragraph 182 which sets out the tests of 'soundness'. We note that comments are to be limited to the 'blue' text within the consultation document and unaltered policies, text, tables and maps are not open to comment.

## Comments on draft Further Alterations

FALP text	Comments
New para 1.7	NOTED - This sets out a factual summary of the 2011 Census result. We welcome the Mayor's prompt response to the appreciation of the reality of the dynamic demographics of London.
New para 1.10D	OBJECT – We would challenge the conclusion that the FALP approach is 'sound' when the Plan is openly failing to approach the current demographic challenge in the manner set out at NPPF paragraph 47, which requires planning authorities to meet the ' <i>full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in</i> ' the Framework. It appears to us that the FALP is capacity led and fails to consider whether there are 'very special circumstances' in London which would justify a selective Green Belt review and/or overspill of the forecast growth outside the boundaries of London. We submit that the approach set out in the FALP is unsound being inconsistent with national policy. Furthermore there appears to be little evidence that the plan is ' <i>justified</i> ' in the absence of clear and transparent consideration of alternative strategies, based on proportionate evidence.
New para 1.15	NOTED – We note the rise in average household size and submit that this emphasises the need to plan for adequate numbers of family housing as well as smaller high density provision which is often wholly unsuited to the needs of families including young children and also the aged.
Amended para 2.31	SUPPORT – We welcome the explicit recognition of the positive contribution made by existing lower density housing.

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<sup>1</sup> Report to the Mayor of London: Geoff Salter: 19 June 2013: The Planning Inspectorate

- Amended Policy 2.8  
OUTER LONDON:  
TRANSPORT
- SUPPORT – We welcome the recognition of the greater dependence on the private car in outer London.
- Amended paras  
3.16, 3.16a & 3.16b
- OBJECT – We are concerned at the social implications of planning for 49,000 additional homes per year in the face of the SHMA indicating a requirement for up to 62,000 dpa. [We assume that the timescale 2015-**2026** associated with the 62,000 provision is a typographical error.] This is not in accord with NPPF paragraph 47 and cannot be considered 'sound'. Indeed, we consider that continuing to plan to underprovide for housing will exacerbate the overcrowding highlighted at paragraph 3.47 as amended.
- Amended para 3.17
- OBJECT – We concur with the reference to NPPF paragraph 47 and we are mindful of the recent Ministerial advice to the Planning Inspectorate<sup>2</sup>, together with the 'distinct circumstances of London'. However, we submit that paragraph 3.17a confirms our view that the FALP is capacity led and the Plan has not considered other spatial scenarios including a Green Belt review and/or overspill to meet the needs of London outside its boundaries.
- Amended Policy 3.3
- OBJECT – Whilst we welcome the significant increase in housing targets we question whether 42,000 net additional homes across London is an adequate and justified response to the revised household projections.
- Paragraph 3.50a
- SUPPORT – We welcome the recognition that older Londoners are likely to prefer to remain in their own homes. We therefore support the need for a positive response to the needs of the ageing population.
- Paragraph 3.88
- SUPPORT – We welcome the revised methodology for Boroughs and LSPs to identify and analyse existing and future needs for social infrastructure.
- Policy  
EDUCATION  
FACILITIES
- 3.18
- SUPPORT – We welcome the explicit recognition of the place of free schools in the provision of additional education capacity within London which is a further social consequence of the increasing population in London.

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<sup>2</sup> Letter dated 3 March 2014 from Nick Boles MP to the Chief Executive Planning Inspectorate

Paragraph 4.48A COMMENT – BGT offer no comment on the future of London's public houses but respectfully point out that the statutory provision for Assets of Community Value can have a wider application. BGT submit that wider strategic guidance on the use of ACV and its materiality to planning decisions is required either in FALP itself or subsequent SPD for which FALP should provide strategic guidance. A co-ordinated London wide approach to the use of ACV to the whole range of social and community infrastructure would be welcomed.

Table 6.3 Cycle Parking Standards SUPPORT – We welcome the review of cycle parking standards and support the minimum standard of 1 short-stay cycle space per 100 sqm for 'Other' Class D1 (e.g. library, church).

**John A Devine**

**John Shephard**

07 April 2014