

From: Nick Vaughan [REDACTED]
Sent: 01 March 2018 13:45
To: Londonplan
Subject: Draft New London Plan – Comments of Annington Homes

Mr S Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
Post Point 18
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London SE1 2AA

1 March 2018

Dear Mr Khan,

Draft New London Plan – Comments of Annington Homes

Annington Homes became one of the largest private owners of residential property in the UK following the purchase of 57,434 homes from the Ministry of Defence (MoD) in 1996. Most of these properties are leased back to the MoD. A significant number, however, have been handed back to Annington. In the years since 1996, we have invested time, money and expertise in regenerating thousands of these homes and returning them to the national housing stock. To date, we are proud to have helped over 17,000 homebuyers, many of whom were first time buyers and key workers. We have also developed, refurbished or redeveloped a number of brown field sites formally in public ownership in London over the last 20 years including at Mill Hill, Uxbridge and Kenley. These schemes have provided good quality homes, including affordable properties, in attractive environments both in the conventional sense and in the sense of more affordable homes for home buyers.

The focus of our future strategy in London is to bring forward PRS schemes where opportunities arise with a primary focus on providing family homes.

We welcome the publication of the new draft London Plan and the concept of Good Growth, namely that which is inclusive and environmentally sustainable to be delivered through the policies of the plan. In particular, we welcome and provide comment on the following policies in the plan, which aim to achieve this overarching concept:

Policy GG2 – We welcome prioritising the development of brownfield land, surplus public sector land and well-connected sites including small sites. We have been and will continue to be an active partner in exploring the potential to intensify land including public land where this is a viable development option.

Policy GG4 – We support the delivery of more new homes including ambitious and achievable build-out rates.

Policy D6 – We support the need to make the most efficient use of land and developing it at the optimum density

Policy H1 – We support the need to increase housing supply across London.

Policy H6 - The requirement to provide for 50% affordable housing on public land must be tempered by the consideration of alternative development options available on individual sites and how public land is brought forward for development on those sites. A blanket approach does not recognise all circumstances. Where Annington has purchased public land from the Ministry of Defence with development potential, onerous affordable housing requirements often mean the most viable development option is to refurbish the existing older homes and

offer these for sale or rent rather than redevelop to provide additional new homes within an intensified high quality development including affordable homes. There must, therefore, be provision within the policy for a flexible approach to providing affordable housing on current and former public land where it is demonstrated that alternative proposals to bring forward development exist which provide an applicant with a greater return, at less risk, at a reduced cost and in a reduced timescale than redevelopment.

An alternative approach that may assist, albeit it too would be reliant on a viability assessment of the refurbishment or redevelopment options, would be to seek 50% affordable housing for additional housing provided over and above those existing at the time of application rather than being triggered by the first new house built.

Policy H9 – We support the application of Vacant Building Credit in the circumstances described in the policy.

Policy H10 – We note this policy aimed at estate regeneration seeks an uplift in affordable housing “*where possible*”. This same flexibility, subject to demonstration on individual sites of alternative viable development options, must also be applicable in the circumstances identified in our comments under Policy H6.

Policy H11 – Annington Homes are supportive of measures by the GLA and Boroughs to use all the tools available to reduce the number of vacant dwellings in London. This is particularly so on public land to deliver the Plans outcomes.

Policy H13 – We are supportive of having a differentiated approach to Build to Rent development proposals that recognises the different model to Build for Sale homes. We note and support the benefits set out in the plan of the positive contribution that Build to Rent development can make to increasing London’s housing supply. We would be delighted to engage with the Mayor in the details of delivering this policy.

Policy H18 – We are supportive of Policy H18 which applies to large-scale purpose-built shared living developments.

We would be delighted to have a dialogue with the GLA regarding any aspect of our representations.

Yours sincerely

Nick Vaughan

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