



ANTHOLOGY

Built from London

Sent by email:-

londonplan@london.gov.uk

Mr. Sadiq Khan

C/O London Plan Team
Post Point 18
Greater London Authority
City Hall
London SE1 2AA

02 March 2018

Dear Mr Khan

Draft New London Plan

Thank you for producing the draft London Plan and allowing us the opportunity to comment upon it prior to examination.

Anthology is firmly committed to housing delivery in London and is in partnership with the GLA to help secure a much-needed step change in housing delivery.

We have reviewed the draft plan and wish to make some comments which we hope will aid the implementation of two of your key policy objectives, namely; increasing land supply for housing and the delivery of that housing.

Increasing Land Supply

Most of Anthology's housing output is from land previously in industrial use. We believe that well over half of London's housing output is from former industrial land. Anthology has reviewed the available research underpinning the draft plan and cannot find any reference to the proportion of today's housing completions which are drawn from released strategic industrial land and other industrial land. We are very concerned that draft policies to restrict the release of industrial land and to treat it as protected (**Policy E4, C**) will reduce housing supply in future years quite significantly.

We are concerned about the proposal (**Policy H6**) to treat affordable housing on public land and former industrial land differently from other land, i.e. the 50% threshold requirement. As buyers of land for housing purposes, our fear is that industrial land values will exceed residential land values (as they now do in some of the more affordable parts of London) and land owners, incl. pension funds, will issue new leases rather than contemplate the long road toward regeneration. Many of London's principal mixed-use regeneration areas will struggle to come forward due to lease renewal and lack of prospect. We have witnessed this recently with those areas with the greatest need of new housing suffering the greatest impact.

In our opinion, the same concern applies to the public-sector land approach to affordable housing. Public land owners are under a duty to secure the highest price for their land in a context of retrenching public funding. Public sector bodies should be suitably incentivised to dispose of surplus land wherever possible and this policy could counteract that objective.

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We believe that large-scale regeneration in opportunity areas, with an emphasis on industrial land release, has bolstered housing supply significantly. And we worry that regeneration will be thwarted by the draft policies. It will be especially difficult for a developer to make the first move, where sales values are lower and risks higher.

Anthology is not convinced that co-location of housing with industry (**Policy E7**) and warehousing is likely to deliver sufficient housing and could produce housing of an unsatisfactory quality for older and larger housing groups. We accept it may be more appropriate for Private Rented Sector housing for younger target housing groups.

Our land modelling confirms the above concerns. We would be happy to share this with the GLA.

Turning now to the Housing Targets (**Policy H1 & Table 4**). We believe that housing targets should be upgraded to account for the rate of implementation of existing planning permissions. If only 50% of permissions are implemented over the plan period, then the housing target should be doubled. We believe this would bring much needed competition in the land market.

Delivery

The London Plan sets the framework for the Borough's development plans, the Mayor's decisions and any appeals that may arise. We feel that London's vast array of transport nodes will inevitably become high rise metropolitan hubs as is confirmed by observation.

But draft policy (**Policy D6**) is much more conservative on building height and requires new developments to take a lead from surrounding context. Often, that context will be two storey housing. We believe this should be reviewed.

Linked to this, draft policy (**Policy D8**) could be stronger in setting out the vision of high rise development adjacent to public transportation. The policy doesn't currently indicate where tall buildings are generally acceptable or unacceptable.

Conclusion

London's new homes have recently been built on land that has been promoted through large scale regeneration and released strategic industrial land all in a context where high densities have been promoted.

We believe that if there is to be no release of land in the green belt, then a permissive industrial release strategy remains the best or only option for maintain housing supply at current levels.

We would be happy to discuss this with your officers and to supply the information referred to in this letter.

Thanks again for allowing Anthology the opportunity to comment.

Yours sincerely

Scott Bailey, MRTPI
Planning Director