

2 March 2018

The Savills logo consists of the word "savills" in a lowercase, sans-serif font, colored red, set against a solid yellow rectangular background.

New London Plan
GLA City Hall
London Plan Team
The Queen's Walk
London
SE1 2AA

Chris Brady
E: chris.brady@savills.com
DL: +44 (0)20 3320 8278

33 Margaret Street
London W1G 0JD
T: +44 (0) 20 7499 8644
F: +44 (0) 20 7016 3749
savills.com

BY EMAIL

Draft London Plan Representations on behalf of Comer Homes Group

These representations are submitted on behalf of Comer Homes Group (CHG) in response to the Mayor's Draft London Plan (The Spatial Development Strategy for Greater London) published on 29 November 2017.

CHG is one of the UK's largest property companies with substantial development and investment interest in a number of market sectors, including: residential homes, office parks, retail parks, hotels and leisure facilities.

These representations relate to the Draft London Plan's approach to the allocation of sites for housing, particularly in suitably located Green Belt sites.

CHG have sites in a range of locations across Greater London including at Vicarage Farm to the north of Enfield Road in the London Borough of Enfield (see plan in Appendix 1) and land to the north of Harefield Hospital off Hill End Road in the London Borough of Hillingdon (see plan in Appendix 2). Both of these sites are situated on Green Belt land.

Housing Need Against Housing Delivery

The pressing need for new homes in London is evident. CHG do not consider that a robust strategy for delivering the homes London needs has been properly considered in the Draft London Plan.

The Draft London Plan refers to an overall need for 66,000 homes per year for at least 20 years. This is a significant increase over the current London Plan target of 42,000. It is identified that to meet this that the rate of housing delivery in London needs to roughly double in comparison to the current average completion rates. Prior to the publication of the Draft London Plan the government consulted on the '*Housing White Paper – Planning for the right homes in the right places*'. The White Paper proposed a standard methodology for calculating housing need and generated a need for 266,000 homes nationwide of which 72,000 are in London. Against these figures the London Plan targets result in a significant shortfall of 7,065 homes a year.

Paragraph 2.0.3 of the Plan outlines that if London is to meet the challenges of the future, all part of London will need to embrace and manage change. Not all changes will be transformative, in many places they are considered to occur incrementally. This is noted as especially the case in Outer London, where the suburban pattern of development has significant potential for appropriate intensification over time, particularly for additional housing.

The expectations of Outer London Boroughs in helping to address housing need is evident when comparing the housing targets outlined in the new London Plan to the current London Plan (2015-2025). The top 10 existing LPA's for uplift in housing targets are: Merton, Bexley, Hillingdon, Hounslow, Sutton, Richmond upon Thames, Enfield, Harrow, Bromley and Ealing. These are all Outer London Boroughs and have seen uplifts in housing numbers between 223% to 116%. At the other end of the spectrum the 10 LPAs with the lowest uplift

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD



or reduction in housing numbers are: Islington, Kensington and Chelsea, Hackney, Tower Hamlets, Southwark, Westminster, Lambeth, City of London, Greenwich and Camden. These are predominantly central London Boroughs and have seen changes in housing numbers between -39% and 22%.

There is a clear focus on the Outer Boroughs delivering the major proportion (55%) of the London Plan housing delivery target. It is also suggested that many of the homes proposed for the Outer London Boroughs will be delivered through 'small sites' (sites up to 0.25ha in size of up to 25 units). Many of the Outer London Boroughs have historically under delivered on housing. As identified in the London Plan Annual Monitoring Report (2013) Outer Boroughs have delivered an average of 11,921 new homes a year. Housing delivery would have to triple in order to reach the Outer London Boroughs share of the housing delivery targets set out in the Draft London Plan (35,789 new homes).

The Draft London Plan has an over reliance on the capacity of small sites to address housing need. The Plan attribute approximately 38% of the increased housing targets across London to small sites. This is particularly the case for Outer London Boroughs where the proportion of housing targets attributed to small sites rises to 46.5%. There is evidence that 'small sites' are not a reliable source for delivering housing. Based on a 12 year assessment between 2004/5 and 2015/16 a total of 129,940 homes (10,828 per year) were delivered on small sites. As such the delivery of small sites will need to increase dramatically over current trends if the small sites target of 24,573 homes per year set out in Table 4.2 of the London Plan are met. This exemplifies the challenge faced by Outer London Boroughs.

Location of Housing

The Housing White Paper (published 7th February 2017) and supporting documents sets out the government's plan to reform the housing market and boost the supply of new homes in England. One of the key themes of the Paper is planning for the 'right homes in the right places'. This includes maximising the contribution from brownfield land and building in locations well served by public transport such as train stations.

This stance is also relayed in the Draft London Plan where it states that existing residential area within PTALs 3 - 6 and within 800m of a Tube or rail station is identified for 'incremental intensification' and expected to play an important role in meeting housing targets.

It should be noted that around 60% of London's Green Belt is within 2km of an existing rail or tube station with this figure likely to increase with planned transport infrastructure improvements. Such suitably located sites should be considered when assessing the potential for delivering housing on green belt land particularly as a key theme of the Draft London Plan is to reduce the reliance on the private car and improve air quality.

CHG considers that a strategy that relies on brownfield land alone will not be able to solve London's housing crisis. This has been the strategy of every London Plan since the first version in 2004. As identified above this strategy has consistently failed to deliver enough housing to meet the demand for the capital.

Policy G2 - London's Green Belt

In accordance with national guidance Policy G2 of the Draft London Plan maintains the strongest protection for Green Belt land and states that "*the extension of the Green Belt will be supported, where appropriate. It's de-designation will not*". This is not in line with national policy. At Paragraph 83 of the NPPF instead of discounting the de-designation of Green Belt land states how boundaries will only be altered in exceptional circumstances through the preparation of the Local Plan. CHG considers that the Draft London Plan should allow boroughs flexibility to review Green Belt boundaries, if local assessments of capacity find that Green Belt sites are required to meet housing need.

It is evident from the above in order to meet the housing targets proposed for London it may be required to consider Green Belt allocations particularly as boroughs with the most Green Belt are amongst those that has been the most significant increase in housing delivery targets. As such it is suggested that Policy G2 is

modified to conform with the NPPF, and its wording should make it clear that the need to solve London's Housing crisis is a factor to be given significant weight when considering exceptional circumstances for Green Belt review.

- A. The Green Belt should be protected from inappropriate development:
- 1) development proposals that would harm the Green Belt should be refused **except in very special circumstances;**
 - 2) the enhancement of the Green Belt to provide appropriate multifunctional uses for Londoners should be supported.

B The extension of the Green Belt will be supported, where appropriate. ~~It's de-designation will not.~~ **boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.**

It is also considered that the supporting text to this policy should be made to the fact that suitably located sites, particularly sites that are located within close proximity to transport hubs, should be promoted. Such intensification of development in these locations will assist in creating sustainable developments.

The Outer London Boroughs have been identified for substantial rises in their housing delivery targets and through an increased reliance on small sites. It is considered that in order to meet such targets that certain Green Belt sites need to be assessed further as to whether they are suitable for delivering sustainably located housing. Flexibility for this needs to be drafted into the wording or supporting text for Policy G2.

Summary

Decades of not delivering enough housing to meet demand has led to a housing crisis in the capital. The Draft London Plan proposes to significantly increase the housing targets for London. Housing delivery rates need to roughly double in comparison to the current average completion rates. Using the standard methodology for calculating housing need proposed in the Housing White Paper identifies a further shortfall.

The challenge for Outer London Boroughs is evident given the identified increases in housing delivery in these locations and historic under delivery. These boroughs also include the greatest amount of Green Belt land. In order to meet these targets it is considered that Policy G2 needs to be reworded so that it is consistent with the NPPF and allows for Green Belt boundaries to be altered in exceptional circumstances. The requirement for suitably located sites, which are located close to public transport hubs, should also be considered and included within the Plan.

The proposed amendments to the Draft London Plan would allow for an all-encompassing approach to be taken to housing delivery. When considering sites for development this would allow for suitably located sites such as at Vicarage Farm and Land to the North of Harefield Hospital to be properly assessed and result in housing being provided in a suitable location.

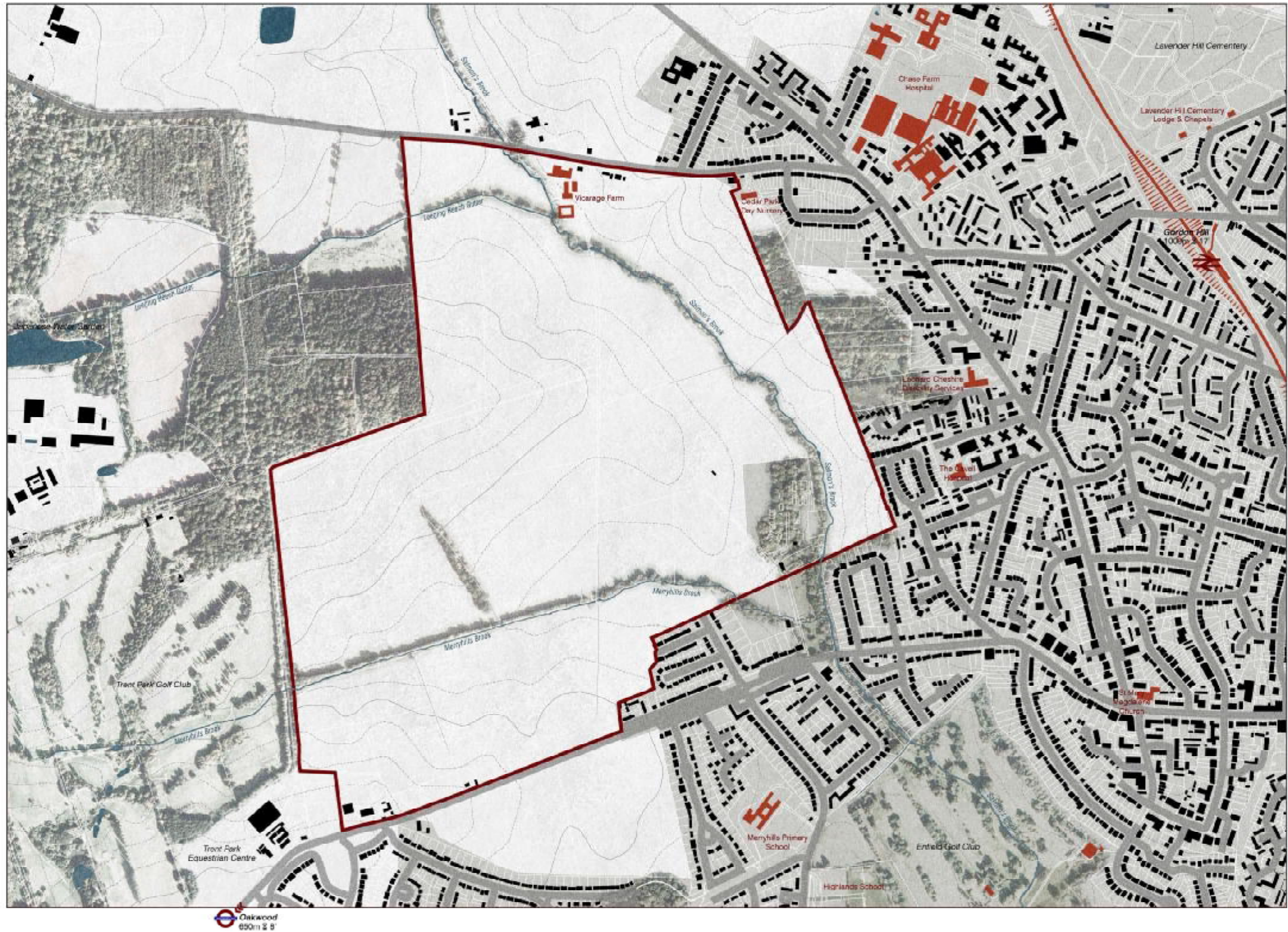
We hope that matters raised in this letter can be taken into account when completing the next stage of the London Plan.

Yours faithfully

Chris Brady MTCP MRTPI
Savills Planning



Appendix 1 - Vicarage Farm - Site Location Plan

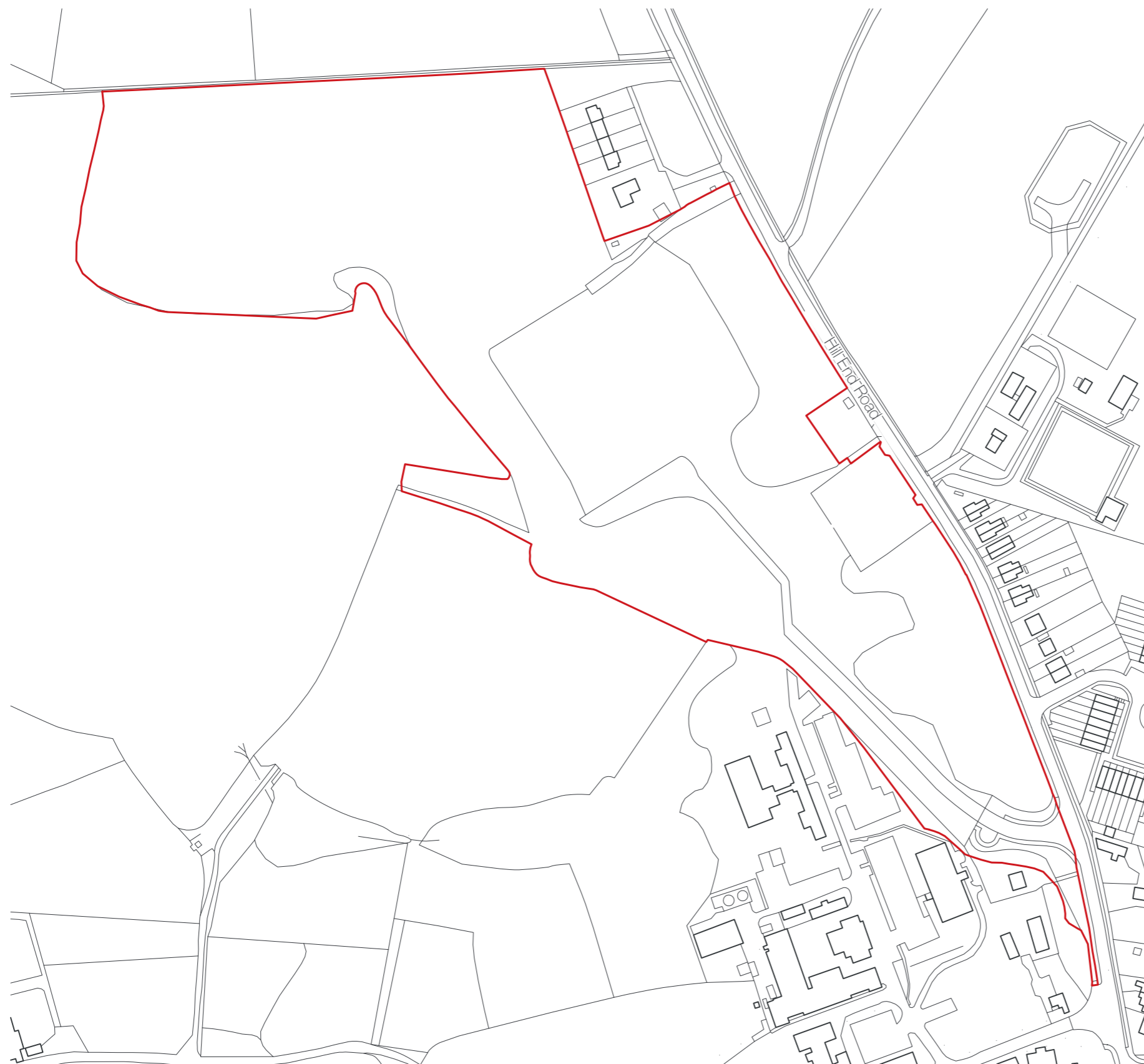




Appendix 2 - Land to the north of Harefield Hospital - Site Location Plan

○ Site

0 10 20 30 50 100 150 metres 1:2500 @ A3



title Site

client Comer Homes

project Harefield Hospital

job no MSBN 380018

date 26 Oct 2016

drawing no PL001

drawn by NH

revision A

checked by CO

urban design studio

Southampton
Birmingham
Cambridge
London
Oxford

savills.com/urbandesign

