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2 March 2018  
Hill London Plan Reps

Mayor of London  
Greater London Authority

Via Email Only:  
[londonplan@london.gov.uk](mailto:londonplan@london.gov.uk)

Dear Sir / Madam,

**DRAFT NEW LONDON PLAN  
REPRESENTATIONS ON BEHALF OF HILL AND TRUSTEES OF THE GWYNETH COWING WILL TRUST  
AND TRUSTEES OF THE GWYNETH COWING 1968 SETTLEMENT**

Thank you for the opportunity to engage with the preparation of the Mayor's London Plan. This representation has been prepared by Savills (UK) Limited on behalf of Hill and Trustees of the Gwyneth Cowing Hill Trust and Trustees of the Gwyneth Cowing 1968 Settlement. It is made in respect of the Draft New London Plan (Draft London Plan) published by the Greater London Authority (GLA) on 29 November 2017.

Hill is a recognised industry leading housebuilder, providing quality, distinctive new homes across London and the South East. Hill has an option with Trustees of the Gwyneth Cowing Will Trust and Trustees of the Gwyneth Cowing 1968 Settlement the owners of the site shown in Appendix 1 (the Whalebones site). The site extends to some 4.366 hectares and lies west of High Barnet. The site is currently private, open land, and has no public access to it. The site is divided into 2 parcels, between which lies The Whalebones, a Grade II listed building.

Hill is currently consulting with local stakeholders and preparing proposals for residential development of the site along with the provision of public open space and community uses. The land at The Whalebones has the potential to deliver new housing, and to fund the delivery of a significant amount of public open space, which would be of particular social and environmental benefit as the area is identified as being in an Area of Deficiency in Access in Public Open Space (AoD). Hill will be promoting the land through the Local Plan for a mixed use allocation for residential, public open space and community use.

We set out below representations of Hill on the Draft London Plan. The representations start by setting out the comments Hill have on the overall approach of the Draft London Plan, with specific regard to delivering housing and green infrastructure at the Whalebones site. We then set out comments on the Mayors ambition to make half of London green by 2050 before making specific comments in relation to the enhancement of green infrastructure and the relevant policies in Chapter 7 of the Draft London Plan.

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

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The main points of these representations with respect to the Draft London Plan are as follows:

- Support for the ambition to deliver significantly more homes in London than have been delivered in the recent past;
- Support for delivery of at least 3,134 homes per year in the London Borough of Barnet;
- The development of Whalebones site will deliver housing, community facilities and a new publicly accessible park in accordance with the ambitions of the Draft London Plan;
- The Mayor's ambition to make more than half of London's area green by 2050 should be re-focussed on reducing Areas of Deficiency in Access in Public Open Space (AoD);
- Hill recognise the importance of green infrastructure and supports the protection and enhancement of public green and open spaces that provide green infrastructure services and benefits to Londoner's and its environment;
- As currently drafted Policies G1 and G4 could prevent delivery of the redevelopment of the Whalebones site and therefore modifications are suggested.

### Overall Approach

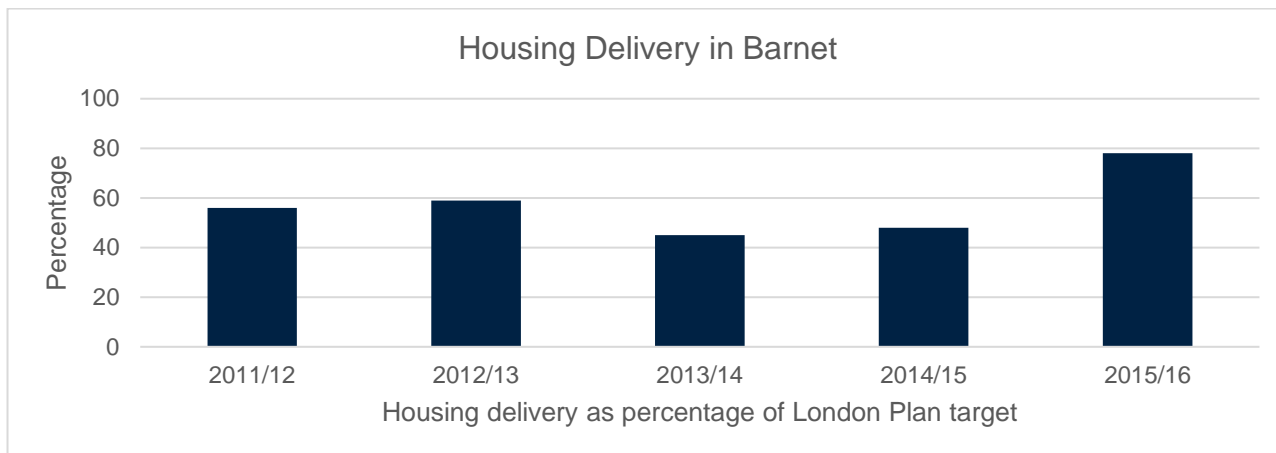
Hill share the Mayor's vision of delivering the homes London needs through making the best use of land whilst building strong and inclusive communities and creating a healthy, resilient city. However, they are concerned that the Draft London Plan contains a number of competing priorities that need to be more clearly weighted to ensure balanced decisions are made. In his recently published Draft Housing Strategy the Mayor made it clear that *"London's housing crisis is the single biggest barrier to prosperity, growth, and fairness facing Londoner's today."*<sup>1</sup> Our clients consider that delivery of housing should be more clearly expressed as **the** priority when making on balance decisions on competing policy ambitions.

The ten year housing delivery targets set out in Table 4.1 of the Draft London Plan represent a significant increase over current targets. There is a clear focus on Outer Boroughs to deliver the majority of London's housing requirement. Hill support the ambition to deliver significantly more homes in London than have been delivered in the recent past, and the focus on the Outer Boroughs, which have historically under delivered against housing targets.

Hill support the increase in Barnet's housing delivery target from 2,349 new homes a year to 3,134 new homes a year. However, as the table below illustrates, housing delivery in Barnet has consistently been under the London Plan housing target. Over that same period the Lower Quartile Affordability Ratio for Barnet has increased from 11.31 to 15.34 and the Median ratio from 10.83 to 14.40<sup>2</sup>. As such it is vital that the New London Plan provides a framework that will substantially increase delivery from the outset of the ten year period.

<sup>1</sup> London Housing Strategy Draft for Public Consultation 2017

<sup>2</sup> Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2016, ONS, March 2017



Source: London Plan Annual Monitoring Report

A large proportion of the housing delivery targets (38%) is on small sites as set out in Table 4.2 of the Draft London Plan, this is particularly the case in the Outer Boroughs where the proportion rises to 46.5%. Whilst Hill broadly support Policy H2 *Small sites*, they consider that the potential effect of this policy on housing delivery has been overstated in the GLA’s Strategic Housing Availability Assessment 2017 (SHLAA). As a result Outer Boroughs will be unable to meet their housing delivery targets unless they identify additional capacity.

Against this context it is crucial that individual ambitions within the Draft London Plan do not simply become constraints on development. Hill recognise the importance of London’s green infrastructure which brings a wide range of benefits and they support its protection and enhancement. However, they consider that the Mayor’s ambition to make London at least 50 per cent green by 2050 could undermine housing delivery whilst doing little to address AoD. In particular they are concerned that policies within Chapter 7 *Green Infrastructure and Natural Environment*, as currently drafted could prevent the allocation of the Whalebones site for development that delivers housing, community facilities and enhanced green infrastructure in the form of public open space, at the outset of the 10 year period.

### Making more than half of London’s area green by 2050

In the Draft London Plan the Mayor’s states his ambition to make more than half of London’s land area green by 2050. This ambition is one of the objectives of the Mayors recently published Draft Environment Strategy, which informs Chapter 7 of the Draft London Plan. The Draft Environment Strategy states that currently 47% of London is classified as green or blue open space. This compares favourably with other world cities in terms of green space per head with London ranked tenth amongst 30 global cities. Yet despite the high proportion of green space, the Draft Environment Strategy states that only 18% of London’s land area is publicly accessible open space. Furthermore, as much as 45% of London’s land area is within an Area of Deficiency for local and district parks<sup>3</sup>.

Hill recognise the importance of London’s green infrastructure to health and well-being, biodiversity, play and recreation, and climate change mitigation. However, it is clear from these figures that having a high proportion of green space does not ensure that Londoner’s benefit from it. Indeed it is difficult to see how a 3% increase to meet a target of half of London’s land area, will address AoD. Hill are concerned that the pursuit of this ambition could undermine the delivery of housing, which must be the number one priority for London, whilst doing little to address AoD. Whilst housing need is evidenced and quantifiable there is no comparable evidence to say that there is a direct and pressing need to make an additional 3% of London green as a general objective. Hill consider that the Mayor’s ambition should focus instead on enhancing the quality of existing green infrastructure and improving access to green space and nature in AoD.

<sup>3</sup> London Environment Strategy Draft for Public Consultation 2017

## Enhancement of Green Infrastructure

Hill support the protection and enhancement of public green and open spaces that provide green infrastructure services and benefits to Londoner's and its environment. London's parks, gardens and designated habitats are often ecologically diverse places that provide pleasure and well-being to the surrounding community as well as helping to mitigate the effects of climate change. However, as set out in the Mayors Draft Environment Strategy, not all of London's green and open spaces provide such benefits and much of it is not publicly accessible. Hill supports enhancement of some of these spaces to unlock their potential benefits but this has to be seen within the context of a severely limited supply of land to meet London's growth requirements.

Hill support the enhancement of existing green and open spaces where they are well placed to provide benefits to communities and the environment. However, funding for this is limited as the Mayors Draft Environment Strategy acknowledged, stating that: *"an increase in green infrastructure investment will require access to new funding sources, including funding from the private sector, and better use and coordination of existing public and charitable funding streams."* The Draft Environment Strategy did not announce any major new sources of funding for London's green infrastructure.

In practice it is development that delivers substantial enhancement to the quality and accessibility of green infrastructure. New development provides the housing, workplaces and infrastructure London needs, including new high quality green infrastructure. Development projects can provide for high quality, publicly accessible green and open space and reduce AoD. The Draft Environment Strategy recognises that in areas that have been regenerated like Kings Cross rail yards and the Olympic Park, high quality green infrastructure has been provided, which has had a significant impact in reducing AoD.

The Whalebones site is an area of private open land, which has two distinctive character areas. The western part of the site has the appearance of overgrown fields and is of low landscape value. The north and eastern part of the site has higher landscape value with mature trees and hedges. These spaces are not publicly accessible and do not provide the social and environmental benefits associated with green infrastructure to the surrounding community.

Hill are developing proposals for the redevelopment of the site in consultation with Barnet Council and the local community that have the potential to provide new homes including a substantial proportion of affordable homes, a new community facility and a new publicly accessible parkland. The proposals will provide green infrastructure that is planned, designed and managed in an integrated way to provide multiple social and environmental benefits to the surrounding community, including benefits to health and well-being, improved permeability, enhanced biodiversity and opportunities for play and recreation. The landscape-led redevelopment of the Whalebones site would result in positive gains for biodiversity in accordance with Policy G6 *Biodiversity and access to nature* of the Draft London Plan. Redevelopment would prioritise the retention of existing high quality trees, and where removal is necessary, adequate replacement tree planting will be provided in accordance with Policy G7 *Trees and woodlands*.

Hill are concerned however, that as currently drafted Policy G1 *Green infrastructure* and Policy G4 *Local green and open space* of the Draft London Plan could prevent Barnet from allocating the site for mixed use redevelopment as they could be interpreted as an all-encompassing protection of any land which is green and open in character. It is the view of Hill that these policies could be more focussed on reducing AoD by protecting and facilitating the delivery of high quality green infrastructure, that is publicly accessible. On this basis Hill suggest the following modifications to these policies:

## Policy G1 Green infrastructure

- A. London's network of green and open spaces, and green features in the built environment such as green roofs and street trees, should be **protected**, planned, designed and managed as integrated features of green infrastructure.
- B. Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation.
- C. Development Plans and Opportunity Area Planning Frameworks should:
  1. identify **and protect** key green infrastructure assets **that meet multiple green infrastructure objectives**, their function and their potential function
  2. identify opportunities to provide new green infrastructure assets to address Areas of Deficiency in Access to Public Open Space, including enabling some development on sites where it would facilitate an overall improvement in the quantity and quality of public open space
  3. identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.

## Policy G4 Local **public** green and open space

- A. Local **public** green and open spaces should be protected.
- B. The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space and **local planning authorities should consider allowing some development on sites where it would facilitate an overall improvement in the quantity and quality of public open space**.
- C. Boroughs should undertake a needs assessment of local green and open space to inform policy. Assessments should identify areas of public green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required<sup>105</sup>.
- D. The loss of **public** green and open spaces should be resisted in areas of deficiency. If losses are proposed outside of areas of deficiency, equivalent or better quality provision should be made within the local catchment area unless an up-to-date needs assessment demonstrates this is unnecessary.
- E. Development Plans and Opportunity Area Frameworks should:
  1. include appropriate designations and policies for the protection of **public** green and open space to address deficiencies
  2. ensure that future **public** green and open space needs are planned for in areas with the potential for substantial change
  3. ensure that **public** green and open space needs are planned in line with objectives in green infrastructure strategies in order to deliver multiple benefits and in recognition of the cross-borough nature of some forms of green infrastructure.



Hill would be grateful if the matters raised in this letter could be taken into account when completing the next stage of the London Plan and would welcome the opportunity to represent these views at the Examination in Public.

Yours faithfully,

**Russell Smith MTCP MRTPI**  
Savills Planning