

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

Wednesday 28th February 2018

Dear Sir,

Representations to the Mayor of London's Draft New London Plan

On behalf of London & Continental Railways Ltd (LCR), I have set out below representations to the Mayor of London's draft new London Plan. We would be grateful if the comments set out in this letter could be fully considered by the GLA prior to the Plan being finalised.

Please note that LCR will submit separate representations with regards to our interests at Chobham Farm Zone 5 in Stratford.

Background

LCR is a DfT-owned property and regeneration company specialising in the management and development of property assets within a railway context and, in particular, property assets associated with major infrastructure projects across England.

LCR's primary focus today is in the area of property development and land regeneration, in order to deliver jobs, homes and economic growth. Nationally, LCR and HS2 have established the HS2 Growth Partnership to work with local authorities, in line with their local HS2 Growth Strategies, to bring forward development around stations on the proposed HS2 route and are involved in the regeneration of the 24-acre Mayfield site in Manchester, along with Manchester City Council, Transport for Greater Manchester and private sector partner.

In London, LCR is a joint venture partner in the £2.4bn strategic development at International Quarter London in Stratford (the latest stage of LCR's twenty year involvement in the regeneration of the Lower Lea Valley); in 2016 the organisation also sold its 36.5% share in the major regeneration programme at King's Cross, for which it was also a steward for almost two decades. In addition, LCR is working with the DfT and Network Rail to bring the former Waterloo International Terminal back into use and is transforming a series of arches at Leake Street into a new dining and leisure destination, as part of the regeneration of this part of the South Bank.

LCR is also helping other public sector land owners within London and elsewhere to bring forward marginal sites for residential development to deliver against housing targets.

Chapter 2 Spatial Development Programmes

Policy SD1 - Opportunity Areas (Central London)

The draft plan only goes into a detailed description of the Euston opportunity area in Central London. Waterloo Station is the busiest railway station in the UK with approximately 100 million passengers using the station each year, and like Euston it is very well located for pedestrian, cycle public transport connectivity but has areas of poor quality environment and sub-optimal land use. Waterloo Station continues to act as a barrier to pedestrian and cycle movement between the South Bank and communities to the east and south of the station. An emphasis should be placed on the strategic planning of development around Waterloo Station to support further intensification of land uses and aid the improvement of local infrastructure to help achieve the healthy streets initiative set out in Policy T2, whilst supporting the character of high streets like Lower Marsh and providing much needed residential and commercial space in an exceedingly well connected Opportunity Area.

Chapter 4 Housing

Policy H5 – Delivering Affordable Housing

Policy H6 – Threshold Approach to Applications

It is LCR's understanding that the main intention of Policies H5 and H6 is to encourage developers to include high levels of affordable housing from the outset, which will allow policy compliant schemes to fast track in lieu of a viability test that would be required for schemes that do not meet the target thresholds.

As a public sector land owner, LCR is supportive of the Mayor's initiatives to maximise and incentivise affordable housing on public sector-owned land through the fast track method. We feel that to achieve this objective, it would be beneficial to have further clarity on the impact of public sector land on a land pooled development which may include both public and private sector land. Will the 50% affordable housing be applied to just the units on the public sector land or the whole development? If the latter, this may have the opposite effect, with public sector land being omitted from larger developments. Small pockets of public sector land shouldn't have an adverse effect on the overall viability of the site as it is undesirable for regeneration projects to be made up of fragmented schemes and could leave sites that are unviable on a standalone basis. Although the viability test will still be an option for the developments that don't meet the 50% threshold, from a private landowners' perspective omitting public sector land will allow them to go through the 35% fast track route.

Furthermore, we would welcome further clarity on how public sector land in a land pooled site will impact an approach where 50% affordable housing is provided over a portfolio of sites. For example, if a public sector owned sub-station or access strip is included in a larger private development, how will this impact affordable housing provision throughout the rest of the portfolio?

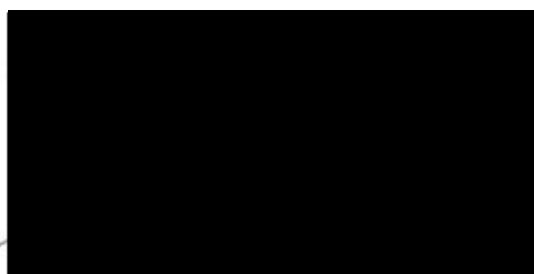
Finally, the plan should provide a more detailed clarification about land that has already been released from the public sector (as referenced in paragraph 4.6.5) and how this will be affected by these new thresholds in practice. For instance, will land that has been or will be sold without an initial view to providing housing be subject to the public sector thresholds if housing is proposed at a later date by a private sector developer? Is there intended to be a fixed time limit after which a site is no longer treated as public land? Clarity over this will help to ensure that development is brought forward as soon as possible and opportunities for delivering additional housing development are encouraged.

We believe that clarity on these policies will ensure all stakeholders are aware of the impact of public sector land from the beginning and allowing it to be properly integrated into land pooled developments with the private sector.

Chapter 7 Heritage and Culture

Policy HC6 – Supporting the Night-time Economy

With Lower Marsh having a NT2 and the South Bank a NT1 classification, there is an opportunity to protect and enhance the night time economy in Waterloo and the South Bank. Where two or more areas are in close proximity it may be useful to know where the boundaries of the various classifications lie, for instance in relation to Leake Street which hosts a number of night time venues. This policy may benefit from a map, giving certainty over the classification of an area, to developers, landlords and potential occupiers.



Adrian Lee
Development Director

