



Greater London Authority
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By email
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8 December 2016

Dear Sir/Madam

RE: A CITY FOR ALL LONDONERS (OCTOBER 2016)

Introduction

We write on behalf of Lands Improvement Holdings (LIH) who specialise in the purchase, promotion and delivery of large-scale residential-led development projects throughout the UK. LIH deliver residential development on brownfield and greenfield land which is focussed on enhancing existing communities to create vibrant places to live and work. LIH, therefore, has a keen interest in the development strategy for London in this crucial time where the need for housing has never been so acute.

LIH currently controls land capable of delivering 400-800 new family-sized homes within the London Borough of Bromley. The land is currently designated as Green Belt, it is surrounded on three sides by development and is a logical and highly sustainable urban extension site. The site has the potential to meet the needs of London and Bromley's growing population to provide housing and community development.

LIH is also looking to acquire further land in the outer London Boroughs at present. LIH welcomes the opportunity to share its thoughts on the 'A City For All Londoners' document and contribute towards the development of the new London Plan. This letter sets out LIH's views on the strategy proposed within this document and where there are opportunities to enhance the delivery of housing.

Accommodating Growth and Housing

The document suggests that London will need to deliver at least 50,000 homes every year between now and 2041 to meet the demands of a growing population. Given the past and continued shortfall in housing delivery (only 27,819 completions were reported in the 2014/15 period) this figure clearly will not be sufficient to meet the Capital's immediate housing need. The new London Plan must be based on an up-to-date Strategic Housing Market Assessment (SHMA) which truly reflects the Capital's housing requirements.

The delivery of 50,000 homes a year spread over a period to 2041 will not

resolve the immediate housing and economic needs of the City, taking into account the substantial backlog of unmet need from previous years. In order to address the immediate housing crisis, housing targets must be substantially higher in the early periods of the new London Plan rather than spread evenly across the Plan period.

Boroughs within Greater London should be preparing local plans which meet the objectively assessed housing need (OAN) as required by the NPPF rather than relying on the minimum London Plan, supply-based targets. Greater London does not have a single housing market and, therefore, in order to meet housing needs which respond to local circumstances (affordability/market signals, affordable housing needs, economic growth etc...) housing targets for each Borough should be based on locally identified needs.

An example of how the existing approach is failing can be seen in the London Borough of Bromley. The London Plan has set a minimum housing target of **641 dwellings per annum** which the Borough broadly seeks to meet without the requirement to look for significant additional housing land. The 2014 South East London SHMA identified an OAN of 1,300 dwellings per annum. We have since undertaken further analysis based on more up to date household projections and believe the OAN is now in the range of **1,430 and 1,560 dwellings per annum**.

In this context the London Plan is currently targeting a delivery of less than half of Bromley's housing needs every year which will only exacerbate the housing shortage within the Borough.

We welcome the Mayor's attempts to provide greater clarity and guidance to the affordable housing and viability process.

Strategy for Housing Delivery

It is disappointing that the Mayor is not exploring every possible avenue to deliver additional housing. The NPPF states that Green Belt boundaries should only be altered in exceptional circumstances, through the Plan making process. London's housing crisis certainly constitutes exceptional circumstances in our view and, therefore, this option for delivering housing land (to supplement the commendable brownfield first and urban focus of the current strategy) must be explored. The NPPF states that where there are exceptional circumstances, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term and the five key purposes the Green Belt is intended to serve.

There is a vast amount of Green Belt land across Greater London which makes limited/no contribution to the five purposes of the Green Belt. Some of this land is also in highly sustainable locations which can make a fundamental contribution to meeting London's housing need. Through a strategic Green Belt review (either at GLA or Borough level), this land of lower Green Belt value could be identified to significantly increase the development land capacity of Greater London.

The release of appropriate Green Belt and greenfield land will provide a variety in London's land-stock which is currently over-reliant on the redevelopment of brownfield land

Whilst we support the general approach to locating development on previously developed land within town centres, this alone is unlikely to provide the capacity to deliver the homes to meet London's housing needs. To do so, all avenues of possible housing delivery need to be explored including opportunities to deliver sustainable development on greenfield and Green Belt land.

To deliver the number of homes required, the proposed strategy of brownfield-only development could have a dramatic impact on London's character, heritage and result in a loss of valued employment and community land. To this regard, it is notable that in the 2014 Inspector's report to the London Plan (2015) the Inspector noted: "I significant concerns regarding whether higher densities can or should always be achieved".

Furthermore, the delivery of housing on brownfield land is often slower and more challenging than greenfield development for a number of reasons which may include:

- ownership issues (town centre/regeneration sites);
- time and cost of demolition and remediation;
- environmental issues; and
- greater financial risk due to up-front costs.

Green Belt/greenfield land can support the primary focus of brownfield development as it is generally more straightforward to develop, which leads to quicker delivery of new homes. Furthermore, as these sites are less costly to develop, they can generally support the provision of social infrastructure including affordable housing and community uses.

Bromley provides an example of how this approach will lead to continued failure to address London's housing crisis. Bromley's emerging Plan is seeking to meet just above the current London Plan minimum target (which is woefully short of Bromley's actual housing need). The Council's trajectory for meeting this target is reliant on the delivery of large-scale and complex town-centre developments many of which involve multiple land-owners and large scale site clearance and disruption. Many of these sites have been allocated and identified in the Council's housing pipeline for years but have failed to deliver new homes.

Whilst the concept and principles of these developments accord with sustainable development, the delivery of significant housing on these sites is unlikely to be delivered in the short-medium term.

In addition to these strategic sites, the Council is reliant on the delivery of unplanned brownfield sites (windfall development) which will not deliver significant

affordable housing/infrastructure to support growth.

Environment

We support the Mayor's intention to promote sustainable patterns of development that will improve the environment and help tackle climate change. The zero-carbon housing policy (London Plan Policy 5.2) is an important part of this objective. However, the guidance must remain clear that this should not affect the viability of development so as to prevent development coming forward.

It will be important for the Mayor and TfL to improve the public transport network, particularly outside central London so as to reduce the need for road travel as much as possible. Development provides an opportunity to support specific transport improvements which can unlock land for development whilst improving the transport and environmental conditions of the existing community.

Summary

We trust that our views expressed in this letter will be taken into consideration in developing the new London Plan. As a residential developer, LIH is keen to work with the GLA to help develop a strategy that will support London and Londoners in overcoming this increasingly damaging housing crisis.

Yours faithfully

A handwritten signature in black ink, appearing to read "Sean McGrath".

Sean McGrath