



Greater London Authority
City Hall
The Queen's Walk
London
SE1 2AA

9 December 2016

By email
yourviews@london.gov.uk
let.006.SS.LA.04250033

Dear Sir / Madam

A CITY FOR ALL LONDONERS CONSULTATION

On behalf of Legal & General (L&G) we submit these representations in response to the public consultation on the "City for All Londoners" document (October 2016).

L&G specialise in the delivery of significant mixed-use developments, including new infrastructure to support sustainable communities.

L&G owns a 200 acre site in Ickenham, Hillingdon (see enclosed plan). Whilst the site is currently designated as Green Belt, it is surrounded on all sides by development and no longer serves the purposes of Green Belt. The site has the potential to meet the needs of London's growing population and would be more sustainably used for housing, jobs, a school or other community uses.

The site is served by Ickenham local centre and South Ruislip town centre and is in walking distance of Ickenham Station, with regular services to central London.

Executive summary

L&G supports the preparation of a new London Plan. To ensure that the plan is positively prepared, justified, effective and consistent with national policy the following changes are requested as part of the next stage of the plan preparation:

- The overall housing targets should be increased to meet London's Full Objectively Assessed Needs (FOAN). These targets should be informed by an up-to-date Strategic Housing Market Assessment (SHMA);
- The provision of family housing in outer London boroughs should be increased;
- Specifically, there should be more new homes and jobs focused in the

LB of Hillingdon to take account of the significant growth that will occur as a result Heathrow and its planned expansion; and

- A comprehensive Green Belt review should be undertaken to identify areas where the current Green Belt designation is out of date and is no longer fit for purpose. Sustainable sites should be reallocated for development to meet London's needs and, at the same time, additional Green Belt land should be designated elsewhere to better serve the city's long term needs.

More detailed comments on the "City for All Londoners" consultation document are set out below:

Part One: Accommodating growth

The London Plan should be based on an up-to-date SHMA and comprehensive Green Belt review.

It was acknowledged by the Inspector for the adopted London Plan in 2014 that the current housing targets fail to meet the needs of London's growing population.

There is currently a backlog of at least 350,000 dwellings and the new London Plan should set more ambitious housing targets than the current London Plan to meet FOAN, including the backlog of unmet need.

The impact of the expansion of Heathrow should also be factored into the new London Plan and will mean that there will be significant population and job growth in the LB of Hillingdon. Additional housing will also be needed to replace homes lost in Harmondsworth and Longford to accommodate the third runway.

Part Two: Housing

To provide a better balance of housing types and tenures, more family housing should be planned in accessible locations, nearby to existing stations, in the outer boroughs.

Despite the majority of Londoners living in the outer boroughs, the proposed spatial strategy directs housing growth primarily to inner boroughs, in the form of high density apartment schemes.

A more balanced approach, as proposed, would reduce the over reliance on high density apartment schemes and would also help to fund more affordable housing and new infrastructure. This is because previously developed sites have more significant development costs that reduce the planning obligations that can be sought on individual schemes.

Allowing for more development in the outer boroughs would also help protect against the loss of essential employment and communities assets in inner

boroughs. This was a point raised by the Inspector in his report to the Further Alterations to the London Plan in 2014, in which he had “significant concerns regarding whether higher densities can or should always be achieved” going onto say that, “London will require new, innovative and possibly unpopular solutions”.

The London Plan should also give special consideration to the use of modular housing to deliver homes quicker in order to meet the backlog of unmet housing needs. L&G is committed to tackling the UK’s housing crisis and has a specialist manufacturing facility that builds bespoke modular homes that can be delivered more quickly, and sustainably, than traditional house building methods.

Part three: Economy

Not meeting London’s housing needs will lead to worsening housing affordability and mean that the London Plan would also fail to meet its wider aspirations for economic growth.

A key objective of the London Plan should be to provide an appropriate supply of employment land and a range of flexible business premises across the city. It should protect existing employment land and, where appropriate, include employment opportunities as part of new large scale housing developments.

Part four: Environment, transport and public space

The London Plan’s spatial strategy should be based on a strategic Green Belt review to assess whether or not the current Green Belt fulfils its function in accordance with principles of the NPPF. Failure to consider Green Belt boundaries would mean that the new London Plan would not be properly justified or sound.

The starting point for any Green Belt review should be to consider areas that are closest to existing transport hubs, that are of poor environmental or public value and could better serve London’s needs by supporting sustainable, high-quality development that incorporates accessible green space. At the same time, new and more suitable areas of Green Belt should be identified to serve London’s longer term needs.

We trust that these representations will be considered in the preparation of the London Plan and we look forward to continue to work with the GLA to deliver the ambitions of the new London Plan.

indigo

Yours faithfully

A handwritten signature in black ink, appearing to read 'Andrew Johnston', with a stylized flourish at the end.

Andrew Johnston

Encs: Site Location Plan

