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28<sup>th</sup> November 2016

**By email only**

Dear Mr Khan,

**A City for all Londoners – October 2016**

I am writing to make representations on the A City for all Londoners, October 2016, document on behalf of Persimmon Homes Thames Valley as a developer with land interests within London.

Persimmon Homes are supportive of the general principles that are outlined within the document and would be pleased to see these aspirations carried through into the new London Plan.

We note that within the document that there is reference for the need to identify land for at least 50,000 homes a year to 2041. This is an increase on the current London Plan figure of 42,000 homes per year (2015-2025). The increase of 8,000 homes is significant and therefore all potential sources of housing land need to be identified and fully considered. Within 'A City for all Londoners' brownfield land is prioritised; we are supportive of this approach. However, the implications that utilising brownfield land can have on delivery timescales can be detrimental when needing to provide more homes in the short term. Brownfield land can require remediation, have competing land uses and potentially have complex land ownerships. This all needs to be taken into consideration when assessing the deliverability of land.

In order to allow the potential requirement of 50,000 homes per year all potential development sites need to be assessed. This includes Green Belt land. Within the document it is clear that the aspiration is to retain and protect the Green Belt. Whilst Persimmon do understand, and respect, the Green Belt designation; it needs to be taken into account that not all Green Belt land meets the five requirements of the Green Belt as set in paragraph 80 of the National Planning Policy Framework (NPPF). We believe that Green Belt land that is not meeting the five requirements should be removed from this designation. The surrounding Local Planning Authorities are reviewing their Green Belt land and releasing it, where appropriate for housing development.

Indeed, as the RTPI have recently set out within their policy statement "*Where should we build new homes*", dated November 2016 a "fresh approach" for directing where new housing should be located needs to be considered by all levels of Government, so that Green Belts work for everyone. The policy statement confirms that, "*it is important to revisit the purposes that green belts need to fulfil over the coming generation..... We need to talk about who green belts are for, and about their social impact, along with their continued role in shaping and managing urban growth*".



The policy statement goes on to suggest that *"green belt boundaries may well need to change, but only through careful reviews over wider areas than single local authorities, and where safeguards are put in place to ensure that development is sustainable, affordable and deliverable in a timely manner, and without prejudice to the renewal of brownfield land"*. All points that Persimmon Homes Thames Valley support.

There is a reliance on the surrounding Local Authorities to take some of the housing need from London. However, the need within many of these authorities is high and there are a number of constraints that also need to be considered within these authorities. Green Belt is one of these constraints. London should look at the quality of its own Green Belt land; release it where the 5 tests are no longer met in order to meet as much of its own housing need within London before pushing the extra housing numbers onto the surrounding authorities.

The aspiration of 50% affordable homes on all sites is an ambitious target and may not be achievable on all sites. As you will be aware viability of a development scheme will ultimately dictate if a development proceeds. We believe that there needs to be some flexibility in the affordable housing target in order to allow housing developments to come forward. Whilst we note the importance of affordable housing, and we will work with Council's in order to deliver the right type of affordable housing, setting such a high target for affordable housing could significantly impact upon housing development within the Capital.

Whilst on the subject of affordable housing it has been noted that there is no mention of Starter Homes within this document. Persimmon support Starter Homes and are willing to work with Councils in order to deliver this housing requirement on development sites. With the Housing and Planning Act 2016 gaining Royal Assent in May 2016 we are surprised that this appears to have been overlooked within this document. Starter Homes may enable more people within London to own their own home.

We are supportive of the principle of intensifying development around transport nodes; this is a logical and sustainable method of growth. Within 'A City for all Londoners' there are many strategies and aspirations that once more specific detail is provided set a clear message and strategy for future growth within London. Persimmon is generally supportive of the document and look forward to further details being released. Whilst the majority of the document is proactive and looks to increase growth some of the points may slow down or stop development in the most suitable and logical of places.

It would be appreciated if Persimmon could be notified of future work on the London Plan.

Kind regards,

Nicola Hume  
**Strategic Planner**  
**Persimmon Homes Thames Valley**