

The Mayor Sadiq Khan
Greater London Authority
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Your ref

Dear Sir

Representations to 'A City for all Londoners' October 2016

On behalf of our client, Taylor Wimpey, we enclose representations to the consultation on 'A City for all Londoners' (October 2016).

Taylor Wimpey are one of the UK's largest homebuilder building a range of properties (private and affordable). They aim to develop vibrant communities with a true sense of place that fit into their surrounding areas and meet the needs of local people.

These representations are made in the context of Taylor Wimpey's interests in the Greater London Authority area.

Taylor Wimpey welcome 'A City for all Londoners' document which sets out a new vision for London and outlines the capital's top challenges and opportunities across priority policy areas in London over the next four years.

We set out below Taylor Wimpey's comments to the document in order of content.

Accommodating Growth

Taylor Wimpey support the need to accommodate as much growth within London and support the need to intensify housing development (including much higher density) around stations and well connected town centres to enable people to live in convenient locations. Taylor Wimpey support proposals for mixed use development across London where viable.

Support should be given for the re-development and re-purposing of some town centres where they are well-connected to the Central Activities Zone (CAZ). There needs to be a coherent strategy for the future of the town centre in question and appropriate investment in the associated infrastructure required to support the growth of the town centre. The Mayor should provide further and clearer guidance on what is considered likely to be acceptable in such locations, having regard to London tall buildings and design policy and where there may be scope to be more flexible on the application of design standards within higher density town centre locations.



Taylor Wimpey recognise and support the need to promote economic growth and the need to respond to the changing economy. However, while recognising the need to promote economic growth, the economy is changing and therefore Taylor Wimpey agree that we must use land intelligently – particularly in the context of a housing crisis that threatens the competitiveness of the city. In some areas, industrial land is surplus to current needs and could be better used for housing and Taylor Wimpey agree that this could be better used for housing.

Taylor Wimpey consider that it would be possible and appropriate to relocate industry to other areas of the city without disrupting the economy or eroding the critical base of industrial land. Taylor Wimpey would urge the Mayor to be creative in how space in London is viewed and should look to take all opportunities to promote mixed-use activity. The Mayor should set out in policy the criteria for when and how releasing such land could be acceptable and identify specific sites in the Boroughs.

Taylor Wimpey agree that the ‘absence of river crossing in the east is a constraint on many people’s lives’ (page 21) and support the Mayor’s initiatives and schemes for improving connectivity in the east of the city. However, there is also a need to ensure that short/medium term solutions are conceived whilst waiting for the longer term solutions to be implemented.

Housing

The previous London Plan Inspector concluded that “Non adoption of the FALP would result in the retention of the existing housing targets in the London Plan (32,210 dpa39) which are woefully short of what is needed. Despite my reservations, therefore, I consider that, subject to a commitment to an immediate review, the FALP should be adopted as not to do so would perpetuate the existing under delivery by not requiring Boroughs to increase supply”.

He also noted that “The evidence before me strongly suggests that the existing London Plan strategy will not deliver sufficient homes to meet objectively assessed need. In my view, the Mayor needs to explore options beyond the existing philosophy of the London Plan. That may, in the absence of a wider regional strategy to assess the options for growth and to plan and co-ordinate that growth, include engaging local planning authorities beyond the GLA’s boundaries in discussions regarding the evolution of our capital city”.

It will be important that the new London Plan addresses these key issues and looks carefully at ways to ensure that the housing requirements for London are met in full.

Taylor Wimpey recognise the importance of housing delivery in London and recognise that the shortage of affordable homes can act as a drag on the attractiveness of our city as a place to live and work. Building enough new homes and catering to the needs of all Londoners is extremely challenging Taylor Wimpey support the delivery of more housing development on TfL and public sector land (NHS) by unlocking their surplus sites for housing and to enable the capital for reinvestment in their services (Page 40). Taylor Wimpey support the development of desirable places to live where environmental and social infrastructure, enterprise and leisure space are integrated.

There is currently no annual target set for new homes in ‘A City for All Londoners’ but it is clear that there is a need to identify land in the capital to build at least 50,000 homes every year between now and 2041’. On this basis it is critical that the GLA provides an annualised target requirement across London and for each Borough, given that each Borough is required to assess



their 5 Year Housing Land Supply (YHLS) position and their need to inform their local plan allocations.

Taylor Wimpey strongly support a review on how planning policies can recognise the distinct economics of build-to-rent, as well as seeking to support it through City Hall investment and helping to develop innovative construction methods, with the scope for a relaxation on standards.

There is a need for a clear way forward to deliver housing typologies and tenures that match the housing needs for Londoners. A percentage target of 50% affordable housing is noted. Whilst a long term target of 50% could be supported, viability needs to be considered carefully to ensure that the target proposed is viable and any policies set should be 'sufficiently flexible to take account of changing market conditions over time' (NPPF Paragraph 50). On this basis, Taylor Wimpey support the principle of no viability required if a certain level (currently noted at 35% or more of Habitable rooms as affordable in the draft Affordable Housing and Viability SPG (29 September 2016)) of affordable housing is provided. Further representations on this matter will be made in due course to the Draft AH&V SPG.

Taylor Wimpey recognise the need to 'increase supply and providing homes that Londoners need which means building new homes both for sale and for rent including a range of different sorts of affordable housing' (Page 39). Taylor Wimpey support the provision of a variety of affordable housing types – low-cost rented, the London Living Rent and shared ownership and also Discount Market Sale as an affordable product. It will be important to ensure that the type of affordable housing to be delivered should be wide ranging and flexible in order to better meet a range of needs to assist with delivery and to respond to changing needs and local need.

Taylor Wimpey support the creation of new Housing Zones and Opportunity Areas.

Taylor Wimpey recognise the importance of the Green Belt, however, this review of the London Plan provides an opportunity for a full review of London's Green Belt to be undertaken (by independent trusted experts) to review the role that the Green Belt could play in easing London's current housing crisis. London's housing need necessitates all Green Belt boroughs having to undertake an up to date Green Belt review as part of their Local Plan evidence bases. The Mayor should set the framework for these reviews so that they are all entirely consistent and comparable. Most Green Belt sites can still be expected not to be released for development and they would benefit from greater protection by the existence of a recent review.

Taylor Wimpey support the protection of designated green spaces and the principle of the Green Belt, but recognise, without undermining the Green Belt's role and its usefulness the Mayor and Boroughs should be open to considering how a small release of Green Belt land could benefit the city as a whole, and the surrounding Local Authorities as well. A small Green Belt land release could have a positive chain effect on many of the barriers and constraints that have led to the housing crisis (land prices in first instance). It will be important for the Mayor to put the relevant Framework in place to ensure that incremental chipping away does not continue, as this detracts from its purpose.

Economy

Taylor Wimpey support the need to 'protect and enhance London's global economic attributes and competitiveness'. There is a need to ensure that people can travel to work comfortably and quickly



and there is a need to increase the supply of affordable housing in the city for a growing and increasingly skilled workforce (Page 40).

Taylor Wimpey welcome the support for delivery of flexible commercial floorspace 'of all shapes and sizes to start up and scale' (Page 54) including (where appropriate) the provision of 'places of work in new housing developments' and also 'affordable business space as part of new developments.

Environment

Taylor Wimpey recognise the importance of the environment and welcome the forthcoming detailed Environment Strategy in 2017.

Taylor Wimpey recognise that 'higher density does not necessarily mean high rise; greater densities can be achieved through a range of designs including mid-rise buildings where appropriate'. However, Taylor Wimpey continue to support the provision of tall buildings across London as they 'play a role in the future of London' as they can 'add value to the existing community – in line with the principles of good growth' (Page 65).

Transport

Taylor Wimpey support all initiatives to support and enhance the transport infrastructure within London and, in particular, the growth potential of 'metroisation' – a better-quality Overground service in more parts of the city but particularly in South London. Looking further ahead, Taylor Wimpey support the Mayor in seeking to secure the Bakerloo Line extension before 2030 and Crossrail 2 by 2033, which will promote house building and create jobs, as well as alleviating overcrowding. Transport infrastructure is key to supporting growth and it will be critical that this is supported and brought forward early.

Taylor Wimpey support proposals to bring forward very significant amounts of housing along a spine from the north east to the south west of the city along the routes of Crossrail 2 and the Bakerloo Line. Taylor Wimpey also support joint infrastructure investment corridors (where infrastructure is planned to open up housing and other development) that stretch out beyond London's borders.

We trust that these representations are clear and will assist the Mayor in the new London Plan. Please do not hesitate in contacting me or my colleague Rebecca Caines, should you require any clarification of any points made.

We would be grateful if you would keep us informed on the progress of development of the new London Plan along with any supporting SPG's, guidance and evidence the Mayor produces.



Nathaniel Lichfield
& Partners

Planning. Design. Economics.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Simon Slatford', is written over a faint, light blue rectangular background.

Simon Slatford
Senior Director