

Barker Review of Land Use Planning

Response by the Mayor of London

Introduction

1. The Mayor of London welcomes the opportunity to respond to the Barker Review of Land Use Planning call for evidence.....
2. The key issue raised in this review is whether planning policies and procedures restrict economic growth and therefore should be relaxed.
3. London's strategically significant contribution to economic growth is being constrained because the planning system in London is still essentially local in its objectives, under-skilled and under-resourced. It is not significantly equipped to attach appropriate priority to strategic proposals and respond to them positively; in particular:
 - this imbalance in the development plan and planning application processes need to be addressed through the review of the Greater London Authority (GLA) powers;
 - plan implementation mechanisms need to be enhanced and appropriately resourced ;
 - serious delays in introducing the new planning system that are preventing strategic objectives from being embedded in local plans need to be challenged; and
 - the backlog of planning appeals that is delaying important new strategic infrastructure and causing undue uncertainty needs to be dealt with.
4. The Mayor has proposed a number of solutions to make the planning system in London 'fit for purpose' in his submission to the Government's review of GLA powers. These are for powers to ensure that Local Development Frameworks conform to the London Plan, and for a new positive power around approval of strategic planning applications to accompany the Mayor's existing power to direct refusal. He has also made recommendations in his submissions to the Lyons Commission on means to finance strategic infrastructure.
5. The foundation for this submission is the simple fact that London is very different from other English regions. London has become one of the most successful, dynamic cities in the world - an economic powerhouse which attracts people from all over the world to live, work and visit. It is also an asset for the rest of the UK. It is driving economic growth in neighbouring regions, and its continued competitiveness is vital to the health of the nation as a whole. This economic success has led to more people coming to live and work in the city. London's population has grown to 7.4 million from a low of 6.8 million in 1988, and it is expected to increase to 8.1 million over the next ten years.
6. In its consultation paper on the review of GLA powers, the Government has recognised that the creation of the GLA has proved a resounding success, providing a voice for London and making a real and positive difference to the capital and to the quality of life of all Londoners. Central to this success has been the strong strategic leadership provided by an executive Mayor with a clear electoral mandate – a strong clear voice standing up for London and accountable to the London electorate.

7. The Mayor's London Plan makes clear that a vibrant, competitive economy is essential if he is to achieve his vision of London developing as an exemplary, sustainable world city. Through its competitiveness, productivity and growth London is one of the few regions to make a net contribution to the national exchequer. London's distinctiveness has given rise to a set of challenges that are different in scale and nature to those facing local government generally. Its growth, which is essential for the continued economy prosperity of the UK, is putting exceptional pressure on the city's housing, transport and other infrastructure. Despite its wealth – London is the UK's wealthiest region in terms of GDP per capita – it has areas of acute deprivation, with the highest level of worklessness in mainland UK. There is also plenty to do in environmental terms to ensure London becomes a world leading sustainable city.
8. Unlike many other English regions, London's economy is dominated by the private sector, which is responsible for 70 per cent of economic activity. Much of the capital's built environment and infrastructure dates from the nineteenth or early twentieth century, so if London is to continue to build on its recent economic success and to accommodate the growth indicated in the Plan, private developers will need to be encouraged to invest in and renew London's fabric.
9. To facilitate economic growth the Barker Review could usefully consider how better to fund infrastructure and services necessary to support growth. This could include new mechanisms to secure investment including those associated with the development of land, and how to make better use of existing resources. For example, the Government's substantial investment in health and, in particular, education provision needs to be more closely coordinated with the housing growth anticipated in the London Plan, especially in terms of timescales.
10. The Mayor is keen that the review has full understanding of the planning implications for economic development in London. He would welcome the opportunity for GLA officers to discuss the issues raised in this submission further with the review team and for the GLA to be an active participant in the review process.

Responses to Consultation Questions

1. Is the planning system sufficiently flexible and/or responsive to the right signals to deliver the right development in the right place, given the changing economic circumstances due to globalisation, demographic change, natural resource pressures and environmental change? If not, what policy measures might help deliver this flexibility?

The Mayor recognised the positive role that the planning system should play in promoting sustainable economic growth. The London Plan, published in February 2004, seeks to plan sustainably for the demographic and economic growth anticipated in London. Investors positively welcome the London Plan because it provides a firm strategic vision for London, which is clear about direction and priorities, but recognises the need for flexibility and pragmatism. Continuing his record of considering strategic proposals within the statutory 14 day timescale, the Mayor is determined that implementation of his own strategic policy should not delay the planning process and so constrain growth. However, experience of Crossrail, Thames Gateway bridge and other major proposals has highlighted delays in the development process occasioned by wider planning procedures.

The Mayor's planning policies and processes are designed to work with the market to achieve his wider objectives. They include:

- Undertaking demand and capacity assessments for housing, industry, retailing and leisure provision in line with national planning policy requirements, and reconciling this with economic concerns about barriers to entry to local markets and constraints on competition
- Relating transport and development capacity to maximise housing and other outputs without compromising viability, quality, affordable housing and other objectives including provision of necessary social infrastructure.
- Securing mixed use development in ways which respect the principles underlying this policy while maximising outputs, especially of housing.
- Encouraging housing development which contributes to affordable housing objectives with and without public subsidy.

The Mayor is committed to rigorous monitoring and, if necessary, timely review of his London Plan to respond to market signals and other emerging issues. His original Plan was published in 2004. Three key alterations to it are already well underway to respond to London's growing needs for housing and waste management capacity and to make the best use of its mineral resources. A broader, but still selective review, will be completed by spring 2008 to address ten key issues including climate change, London's role as a world city and its other economic needs, the Olympics and social exclusion.

More needs to be done in terms of cross-borough and sub-regional arrangements to deliver the London Plan. These arrangements need to marry plan proposals with resources and funding into true implementation plans. These would send clear signals to the markets and provide investment certainty for developers.

It is a matter of significant concern that the new planning system at the local level is already running into delays. It has also become apparent that core documents, ie what issues need to be addressed as a priority by the new round of local plans, do not adequately reflect strategic priorities for London. Issues of general conformity with the London Plan need to be addressed by boroughs more quickly than at present.

- 2. Do you have any views on the scope of plans at the different spatial levels in England which are now emerging following the introduction of the new system in 2004? Are there further improvements to the plan-making process at the different spatial levels in England, particularly regarding the need to encourage a positive/proactive approach to planning, which was a key theme of the new plan-making system? Does the current system strike the right balance between central direction and regional and local discretion?**

As the Mayor's response to the ODPM Review of GLA Powers consultation makes clear, London's planning system is not currently delivering the objectives set out in the London Plan for strategic projects. Local development plans often do not reflect the city-wide priorities set out in the London Plan. The Mayor believes that at present, the London planning system does not strike the right balance between regional and local discretion, and has sought to address this through the Review of GLA Powers.

It is not only planning decisions made in London that closely affect the capital. There is also currently concern that the approach being taken in preparation of regional Spatial Strategies for the South East and East of England does not fully recognize the way in which the city region operates as an economic entity, accounting for two fifths of national GDP.

In terms of the relationship between strategic and local planning, it is essential to streamline the process whereby strategic objectives are effectively reflected in local decisions. The present arrangements can send confusing messages to developers, result in an inefficient use of public resources and compromise strategically important developments. The Mayor should have new powers to direct a local planning authority not to adopt a local plan if it is not in conformity with the London Plan. He should also have positive powers around approval as well as refusal for defined categories of strategic planning applications. This would operate as an incentive for boroughs to make planning decisions in conformity with the London Plan. The Secretary of States 'call in' powers would remain but he would be asked to exercise them much less frequently.

More emphasis needs to be given to proactive planning in plan preparation. Further work is required to strengthen the links between plan-making and implementation. The Mayor is in a unique position as the executive head of the GLA group to coordinate strategic development planning, transport provision and economic regeneration; there is a strong case in London to build upon sub regional arrangements, master planning and infrastructure planning and experience in partnership working with the private, public and community and voluntary sectors.

Within London, and from experience of preparing the original London Plan, it would be useful if government did not take a mechanical, 'one size fits all' approach to implementation of national policy so it can be tailored more sensitively to operation of the market in London's unique circumstances. This would reduce delays occasioned by government intervention at various stages in the statutory planning process. Concerns exist as well about the coordination at national level between high spending government departments and delivering spatial planning objectives.

- 3. Sustainable development is the core principle underpinning planning. Does the current system achieve the right balance between economic and other goals, such as the regeneration of areas and the promotion of social cohesion, improving the quality**

of design of buildings and urban environments, and the protection and enhancement of our natural and historic environment? Are some environmental, natural resource, or social considerations given too much or too little weight?

The Mayor's London Plan seeks an equitable interpretation of the 'triple bottom line' definition of sustainable development, balancing economic, environmental and social concerns and taking into account London's unique role as a world city and as a net contributor to the national economy.

The current spatial planning system seeks to consider competing interests and be more transparent in identifying and acknowledging the key spatial issues. However, there remains an imbalance. Much of this is due to a skills shortage within the planning system to deal with complex issues. An example of this is the evolving environmental agenda that is growing out of global and European regional strategies. These have to be translated at both strategic and local levels and the technological knowledge and skills within the planning profession (policy and implementation) is not widely established.

Understanding of economic determinants of growth is reliant on access to good economic data and analysis. The GLA is fortunate in having an outstanding team of economists and data analysts, which updates the evidence base for planning research. The promotion of social cohesion although longer established than the environmental agenda, still struggles to be properly represented and understood within the planning system. The Mayor is committed to addressing climate change and this matter will be the key message in the future alterations to the London Plan. The issue of design, although clearly a subjective area, remains one where the lack of common understanding and professional interpretation demonstrates the skills imbalance inherent within the planning system.

4. What, if anything, could the English planning system learn from the planning and consent systems operated in other countries in order to respond to this new economic environment?

What is apparent from international comparisons is that among some of London's main competitors the plan-making and ratification processes are simpler and more action oriented. These action plans are backed up with funding investment mechanisms. Cities such as Beijing, Paris and New York are able to initiate major projects regardless of differences in their planning systems, land ownership and investment funding.

The planning system in the Netherlands provides a system that is well integrated, ensures certainty for developers and maintains high standards of design. It is worth noting that the academic institutions provide training that covers architecture, spatial planning and engineering, so is well equipped to respond to changing strategic drivers.

Whilst the economic development challenges are significantly different in Australia, the planning system there provides a closely integrated hierarchy of state and local plans that ensures greater consistency and certainty for all stakeholders. Their system is also well tailored to allow quicker revisions and amendments to plans.

5. What is the impact of planning on encouraging or impeding business investment? In this context, how would you assess the potential of recent reforms to the English planning system, which are now being implemented? Are they increasing the

transparency of the system and providing greater certainty for businesses? What further reforms, if any, are desirable in order to improve the transparency and effectiveness of the system still further?

Engagement with business stakeholders has repeatedly highlighted their need for certainty in the planning system, whether this be in terms of policy implementation or in the timescales under which it will be delivered. At the same time there they seek flexibility in interpreting broad policies in the light of local circumstances and realism in expectations of the contribution individual proposals can make to achievement of wider objectives including essential supporting infrastructure.

In terms of London's specific planning arrangements, a number of businesses responded to the ODPM consultation on the Review of GLA Powers expressing their support for the Mayor's proposals on planning. This reflects their support for the strategic direction set out in the London Plan, and the city-wide stability it provides. While businesses are keen to continue working closely with all parts of the planning system, several recognise that the system can be improved with enhanced Mayoral powers.

On balance, planning generally has a good impact on encouraging medium- and long-term business investment. Stable investment decisions are able to be made on the basis of well thought out and widely consulted upon policies. Strategic employment designation; town centre location policies for large people-generating development allow businesses to invest in necessary infrastructure and maintain its capital investment. It is difficult to provide the required flexibility to accommodate entrepreneurial activity that may only have a window of opportunity of a couple of years, especially when it relates to a technological advance that has environmental impacts that have not been previously anticipated.

The new planning system has introduced amongst other things, the concept of making the system front loaded in terms of public consultation and ensuring that there is a sound evidential base prior to policy decisions. Despite the intention of Statements of Community Involvement, there is concern about their efficacy in practice. They are seen as yet another in a raft of new planning documents, that can induce 'consultation fatigue'.

The provision of a sound evidence base as well as appropriate monitoring of planning decisions are good planning practice. Attracting and retaining experienced staff to operate the planning system efficiently is a more immediate concern and potential constraint on economic growth.

6. Is the planning system sufficiently "joined-up" with other related aspects of government policy? In particular, are Regional Economic Strategies delivering a clear economic framework to help inform Regional Spatial Strategies? Is there sufficient interaction between RDAs and RSSs when preparing their respective regional strategies and if not how might greater interaction be encouraged?

In London the integration of the Development Agency within the rest of the GLA group means that the regional spatial and economic development strategies are effectively coordinated. The London Plan (the spatial strategy) provides the geographical framework to link the economic development, transport and other Mayoral strategies eg bio-diversity, energy and a means of implementing these, where relevant, through local spatial strategies. There is a well established joint policy development programme between the

London Development Agency (LDA) and the GLA, including a common economics research facility.

7. Planning applications for major projects will typically take a considerable time to work through all the necessary stages. Do you consider the system puts too much emphasis on speed or do you feel that is too slow? If there is an undue emphasis on speed, what are the negative consequences of this and how could they best be avoided? If the process is too slow, what could be done to overcome delays? In particular, what improvements might be made to the planning appeal system to improve its speed and efficiency?

The Mayor has an exemplary record in reaching his strategic planning decisions within the statutory 14 day period. The quality of these decisions is secured through continuous engagement with stakeholders in the general development process and through pre-application discussions and advice to those involved with specific proposals.

However, he is concerned at the way in which the wider planning process is operating including the delays it can incur. Recent examples of major infrastructure projects in London have pointed to the system currently being too slow.

Delay is a significant cost of the planning system, whether for major projects, or smaller more typical planning applications. Excessive delays in consideration of planning applications lead to significant economic losses as land and resources remain unused, and the potential benefits of investment are foregone for the period of time of the delay. For large developments in general, delays in the decision making process can mean that some planning applications can take up to 12 to 18 months to reach a conclusion, with the possibility of this timeframe being more than doubled if a proposal is called-in by the Secretary of State or is subject to appeal.

Major projects are usually the most complex and require significant input from a variety of different organisations with competing interests in terms of outputs. The local planning authority is under severe pressure to resolve those competing interests within the prescribed time limit that has been set by central government. The Mayor is constrained by the fact that his formal comments are reported to the relevant local planning authority's planning committee only as another statutory consultee without appropriate weight. This is dependent upon the culture and behaviour of an individual, despite the fact that the London Plan is an integral part of the development plan system. The Mayor's main role or impact at the formal application stage is generally felt after the local authority has resolved to grant conditional planning permission. The Mayor's role when a local planning authority is hostile to the strategic benefits of an application can only be felt if the applicant/developer lodges an appeal against a local decision to refuse planning permission and involves significant time delays and expense to overcome the refusal reason(s). It is clear that schemes of strategic importance can be seriously delayed or thwarted by this process. There is a clear case for the Mayor being given positive planning powers over certain strategic cases in order to ensure more rapid determination of major schemes in line with the London Plan.

There is widespread concern that the Planning Inspectorate has a serious backlog of cases. The planning appeal function must be properly resourced if the planning system is going to operate efficiently.

8. Is there evidence to suggest that the direct costs of making a planning application are deterring investment? Are there any unnecessary burdens/how might information requirements be streamlined to reduce the regulatory burden from the process of making an application?

Experience suggests that pre-application discussions facilitate successful planning applications and that where local planning authorities charge for such services, the overall costs are outweighed by the speed of decision-making. However evidence of how the direct costs of making a planning application deter investment is difficult to obtain and we are not aware of any recent quantitative attempts to do so. This is not unexpected as investment deterred is not an easy concept to capture in a quantitative manner.

Nevertheless, the direct costs of a planning application, alongside the indirect costs arising from delay, are commonly cited criticisms of the planning system from business. These various financial and time costs can all be considered as ‘transaction costs’ of dealing with the planning system. By adding to the costs and uncertainty of a development decision, it is clear that these transaction costs must have some deterrent effect upon investment, in comparison to a case where such costs do not exist. The difficulty is in measuring the size of such an effect and in identifying the type of investment decision most likely to be negatively affected. We know that developers are finding it increasingly difficult to operate in London due to the complexity and uncertainty of the planning system. Some developers have reported that they are thinking of moving out of London to work in areas where planning is relatively easier.

It would appear likely that the costs will be lower for companies who regularly develop (and have systems/consultants etc in place to make planning applications) than for a similar planning application from a company that rarely develops and must ‘learn’ the correct method of making an application. As the former is more likely to be a large company and the latter a small company, it would appear probable that investment is more likely to be deterred amongst smaller companies who are only ‘occasional’ users of the planning system than amongst larger more frequent developers.

We would suggest that there should be a higher fee for large and complex applications, perhaps via a voluntary charge, coupled with clear performance and timetabling agreements between the local planning authority and the applicant. In London, this should also include the GLA where relevant.

9. To what extent are high occupation costs in England likely to be due to planning constraints, or due to other factors such as imperfect competition or lack of transparency in the land market? What is the economic impact of these costs in terms of the main drivers of productivity?

London has a pressing need for more and better quality housing, delivered in communities that are sustainable. Housing in London is under considerable pressure as a result of the long-term failure of new housing supply to meet rising demand. The London Plan aims to help deliver the Mayor’s target for affordable homes in the capital – and it is central to the Mayor’s case for enhanced powers over housing and planning that these are needed to implement the London Plan targets.

Nonetheless, the picture is more complex. Housing completions lag significantly behind approvals, as shown in Annex 1, so addressing the severe problem of affordable housing in London involves providing the framework to increase completion rates as well as maintaining and enhancing approvals past their current rate.

Annex 1, based on the GLA London Development Database, illustrates that, on the face of it, the planning pipeline in London for different types of development does not appear to be constraining demand. It is usually substantially in excess of demand as expressed by completions. Independent research¹ suggests that the full office development pipeline contains the equivalent of nine years capacity at average rates of take up - almost three times the minimum thought necessary for efficient operation of the market. Engagement with the office development sector confirms that office occupation costs are above those of many but not all international competitor cities. However, property costs as a whole are typically well below 15 per cent of overall business costs and declining as a share of these. In real terms rents have also been declining. Even the aggregate housing pipeline, which typically exceeded completions by a factor of two before the GLA was established currently does so by a factor of almost five.

However, such figures do not tell the whole story. They do not explain the low levels of starts to approvals and if there are planning constraints constraining private development.

10. How does the planning system impact on competition, through influencing barriers to entry and exit and economies of scale? If there are areas where there is a negative impact, how can these be addressed, while protecting other goals of the planning system?

The Mayor has refined national planning policy to ensure that his own policies do not fossilize land in unproductive uses while protecting lower value uses which are essential for London's wider functions. For example, he requires retention of industrial land to be justified in terms of strategic and not just local demand, justifying an annual target for managed release of some 40 ha of surplus industrial land to other uses. Similarly, he seeks the redevelopment of surplus office stock in areas of low market demand and only offers offices protection from higher value uses like housing where these might compromise strategic business clusters. In line with national policy he obliges boroughs to identify capacity in appropriate locations to meet future retail need. He also seeks to work with developers and retailers to identify appropriately located development capacity and to explore how their business models, including large formats, can contribute to his overall objectives to secure sustainable development.

However at the local level, planning decisions can be parochial, and even perverse. For example, schemes that extend across more than one local planning authority area, may meet one set of planning criteria but not the other. If the authorities involved arrive at different conclusions, the only course of resolution at present is through a public planning inquiry. Two relevant examples are the Lots Road Power Station development and the Greenwich Meridian Gateway scheme. If the Mayor could have determined the cases, a lengthy planning inquiry could have been averted.

¹ London Property Research. London Office Policy Review 2005/6. GLA forthcoming

Refusals are on the increase because local planning authorities try to make decisions within government set targets. Although the schemes may subsequently be approved, over-emphasis on performance targets is leading to unnecessary delay and expense for developers.

11. To what extent does the planning system effectively support innovation through fostering the formation of business clusters and wider agglomeration of economic activity?

The Mayor's planning policies provide broad thematic support for innovation and specifically foster the formation of business clusters by:

- taking a liberal approach to business related development;
- offering important office clusters selective protection from higher value uses e.g. housing and exempting them from the general requirement for on site mixed use re-development;
- protecting defined, strategically important clusters of industrial type uses;
- offering more general protection for clusters of creative industries;
- seeking affordable workspace for SMEs;
- providing selective support for science park development;
- encouraging strategic 'corner-stone' developments e.g. convention center, aquarium, casino;
- supporting rejuvenation of strategically important retail and leisure clusters in town centers and the West End and resisting such development in inappropriate locations.

12. Do planning authorities have the skills and resources required to help promote sustainable economic development? If not, what is the best way to ensure that resources match the challenges the system faces? Are there ways to increase further efficiency of process?

Because of the close integration of the GLA group, planners and LDA economic development officers work together to promote sustainable economic development. However the shortage of planning capacity at the local level is a matter of on-going concern. There is an over reliance on agency and temporary staff. Ideally we need like to see the British planning schools replicate their Dutch counterparts in producing professionals with a holistic skill.

13. Are the new arrangements for stakeholder engagement in the plan-making process succeeding in engaging those representing economic interests, including SMEs? If not, what are the barriers to that engagement and how might they be addressed?

London Plan preparation, implementation and review entail a consultation process significantly more extensive than that required by statute. This engages a wide range of business stakeholders including representatives of SMEs. In addition the Mayor maintains an on going process of engagement with the London business community through his Economic and Business Policy Director.

14. Are there ways that the incentive structure for decision-makers and local communities can be improved so that a balance is achieved between local interests and the interests of the wider community regarding proposals for economic development?

At present this structure is strongly weighted in favour of local interests to the detriment of strategically important economic development initiatives. In some cases, local interests have an effective veto on development. It is essential that the planning system in London is balanced more equitably so that it can more effectively take account of the strategic drivers of economic growth, especially those associated with large scale development.

There is a strong case for the Mayor to have additional planning powers to readdress this imbalance as discussed above.

15. Economic development can help achieve the regeneration and renaissance of urban and rural areas. Are there ways which planning could strengthen economic performance in regions, sub-regions (including city regions) and at the local level?

To strengthen economic performance in the regions it is essential that the planning process is refined to give greater weight to the strategic constituency so that balanced consideration can be given to large scale development proposals. At a more general level, the solution to much regional under-performance requires strategic rather than small scale local action e.g. infrastructure to enable residents in large conurbations to access the competitive agglomerations of economic activity usually concentrated in their cores. Which is not to say that small scale local action does not have a complementary role – it does e.g. child care provision and encouraging businesses which provide part time work can open up opportunities for groups which hitherto have difficulty accessing the active labour market. However, at regional level, effectively coordinated strategic policy and initiatives are crucial to enhancing economic performance.

Agglomeration benefits in major urban areas increase the economic value of transport investment in London, even further than under current transport appraisals. There is evidence, for example from research on the Jubilee Line extension, that transport also creates land value increases. But current local government finance arrangements do not allow land value capture; the current system inhibits the capacity for London to realise land value increases from transport investments. Doing this would put transport investments on a sounder footing, and give London the tools it needs to meet its infrastructure needs.

As things stand, London's arrangements for financing infrastructure investment remain weak. Despite the clear evidence that land value increases in line with transport investment in London, and the need for significant additional investment, it is not possible to use this increase in value to finance the original investment and remove constraints to further economic growth.

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Annex 1

Development Monitoring

Comparison of Figures 1 and 2 below, based on the GLA's own London Development Database, show that in 2005 alone nearly five times as much office and light industrial space (1.17 mll sq m) was approved as was completed (0.21 mll sq m). More than 16 times as much storage and distribution space was approved (0.37 mll sq m) as was completed (22 mll sq m). Comparable factors for retailing were 5 (27, 000 sq m completed) and for general industry 15 (nearly 12,000 sq m completed).

Fig 1 Commercial floorspace by planning use class approved in London 1995 - 2004

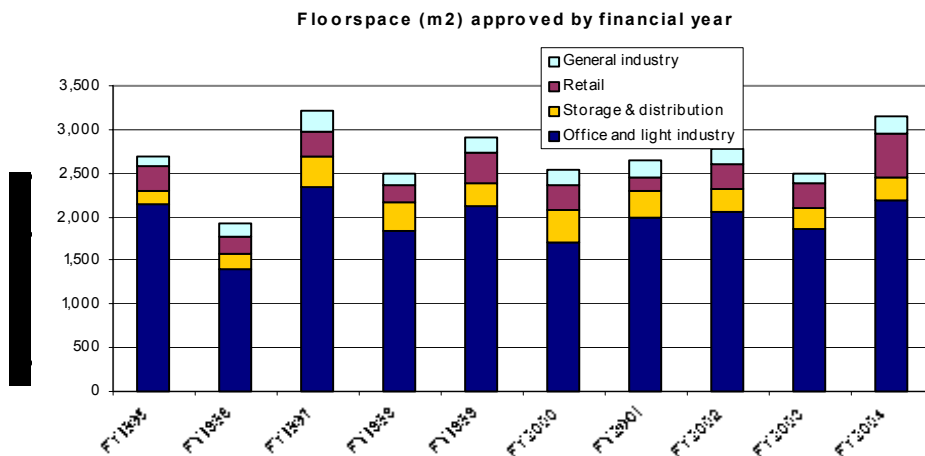


Fig 2 Commercial floorspace by planning use class completed in London 1995 - 2004

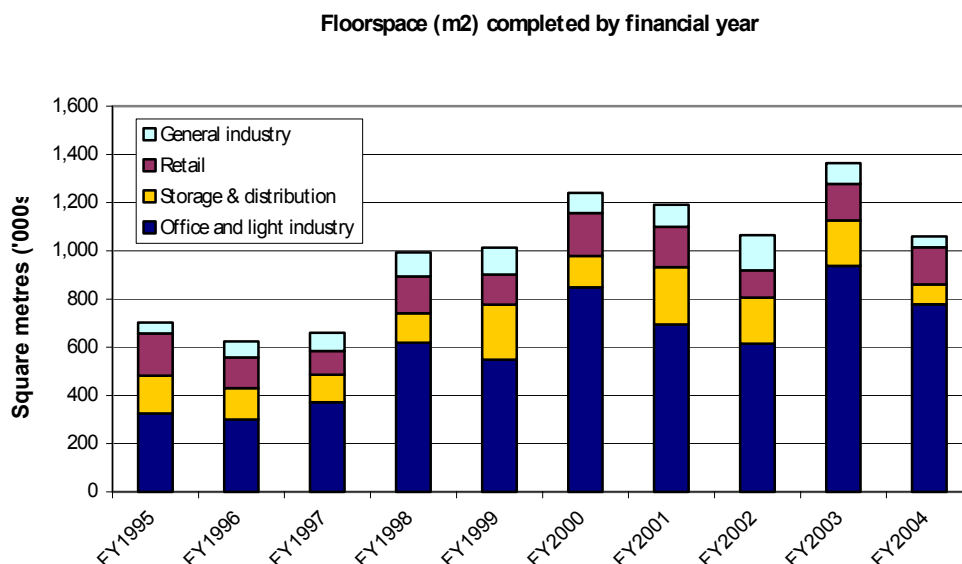


Figure 3 shows a significant increase in housing completions since 2002 with the 2004/5 net completions from conventional supply increasing to 22,885 homes. (If hostel provision and vacants returning to use are included, the figure increases to 27,364). Figure 4 shows that the increase in housing permissions since the GLA was established has been even more marked. Residential permissions have doubled since 1999, the most significant increase being in 2004/5:

As at March 2006, the full development pipeline (planning permissions not yet completed) in London is estimated at 163,200 residential units, of which 59,400 are under construction.

Fig 3 Housing Completions⁸ in London 1997 – 2004/5

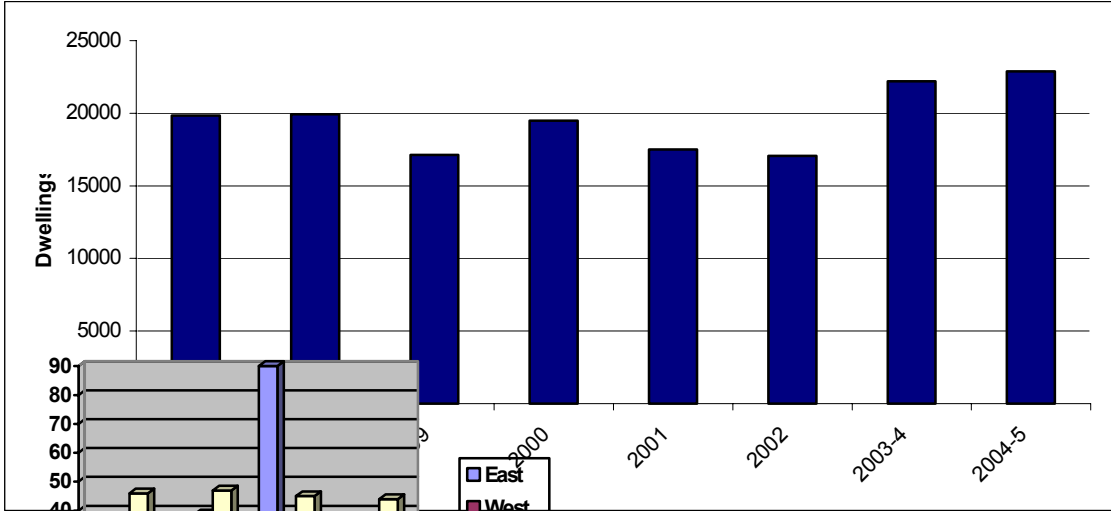
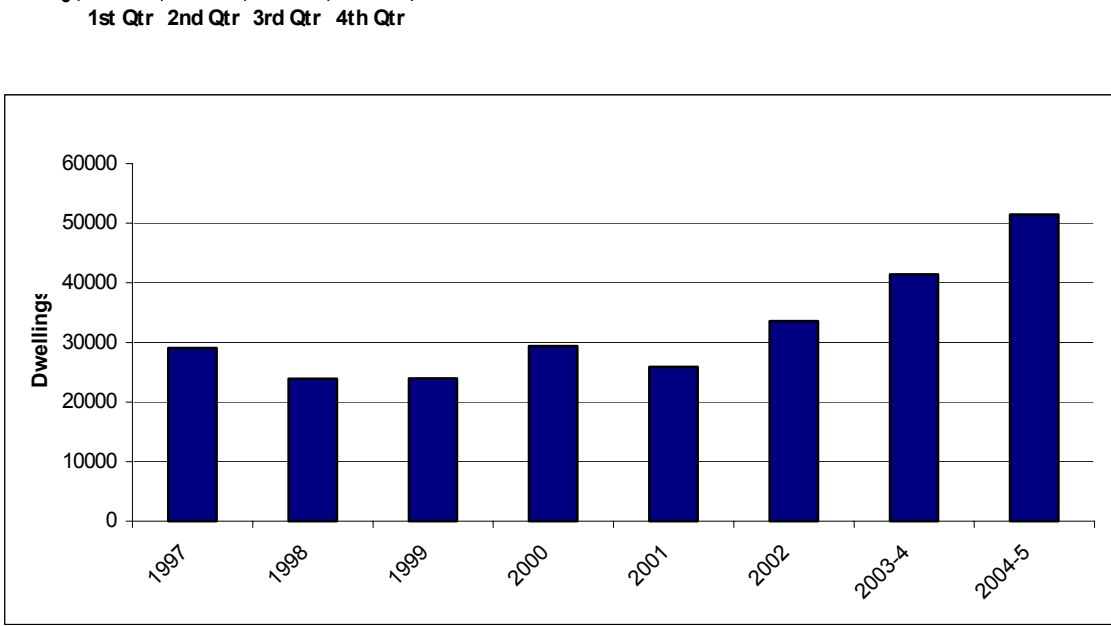


Fig 4 Housing Completions⁸ in London 1997 – 2004/5



⁸ Conventional dwellings only. Data collection changed from calendar to financial year from 2003