



# LandSecurities

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Group Chief Executive

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Our ref FWS/adc

Dear Madam

## **Barker Review of Land Use Planning**

We have pleasure in setting out representations to this review.

By way of background, Land Securities Group PLC is the largest quoted property company in the UK and in Europe (measured by market capitalisation). The current market capitalisation of the company is over £9.0 billion and the company owns £12 billion of gross assets. More relevantly to this review, the company also has one of the largest, if not the largest, programme of commercial developments in the UK. Our current forward development pipeline will involve some 6m sq ft and £3.5m of investment across central London office and town centre shopping centre development. We also have an active involvement in the urban community development sector in North Kent adjacent to Ebbsfleet International rail station where we are planning to deliver 13,000 residential units and 10m sq ft of commercial and community floor space over the next 20 years. This is generally regarded as one of the pre-eminent sustainable community development opportunities in the Thames Gateway.

The terms of reference for the Review are around an assessment of:

- a) Ways of further improving the efficiency and speed of the [UK planning] system.
- b) Ways of increasing the flexibility, transparency and predictability that enterprise requires.
- c) The relationship between planning and productivity, and how the outcomes of the planning system can better deliver its sustainable economic objectives.
- d) The relationship between economic and other sustainable development goals in the delivery of sustainable communities.

The evidence and experience-based opinion set out below address points (a) and (b). We do not have access to national data relevant to point (c), and we have refrained from attempting to answer point (d) because the term 'sustainable communities' lacks sufficient definition.



The background to land use planning in the UK is that the UK is a relatively small and densely populated country with an historic heritage in many town/city centres and visually attractive countryside. Since the Second World War land use planning has been largely successful in protecting this heritage, while allowing commercial and residential development to proceed. In our opinion, the issue is not with the principles of land use planning applied in the UK, but with the efficiency of delivery of planning consents within the land use policy framework.

By way of example of the current inefficiency of the system, we would refer you to our outstanding application for outline planning consent for 6,250 thousand homes and 3 million sq ft of commercial floor space in Eastern Quarry in North Kent. This is a key Thames Gateway development site where sustainable community principles will be applied. Our first outline planning application was submitted in January 2003. We are still awaiting grant of an outline planning consent almost three and a half years later. The local planning authority eventually resolved to grant outline planning consent in July 2005 (after two and a half years), but full outline planning consent is still outstanding pending resolution of highways issues.

We consider that the impediments to the efficiency, speed and predictability of the planning process are:

1. Planning Officer/Planning Department resources - in terms of both quantity and quality of resources.
2. Highways issues.

In our experience, large and small planning applications across the country are frequently held up for months by the extended time required to resolve highways issues, whether strategic or detailed.

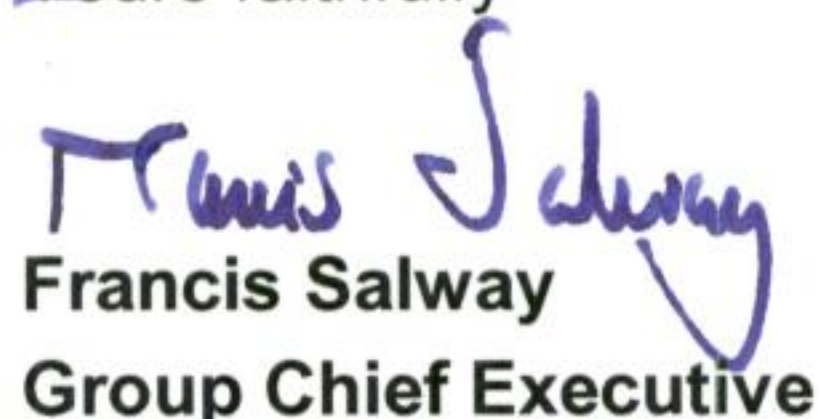
3. Lack of sufficient delegated decision making for Planning Officers.
4. Lack of direct financial benefit for local authorities from the development and regeneration process.

We believe that the business rate incentivisation scheme should be extended significantly.

In conclusion, we believe that problems arise not from the land use planning principles embodied in legislation, but from the efficiency of processing planning applications.

Lastly, we were surprised by the timing of this review in that many of the proposed changes to the development control system made in the new Planning and Compulsory Purchase Act 2004 have yet to be implemented; it is therefore not yet clear how well the new provisions are performing.

Yours faithfully

  
**Francis Salway**  
**Group Chief Executive**