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Sadiq Khan (Mayor of London)  
New London Plan  
GLA City Hall  
London Plan Team  
Post Point 18  
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London SE1 2AA

*Sent via email to: [londonplan@london.gov.uk](mailto:londonplan@london.gov.uk)*

Dear Mr Khan,

**DRAFT NEW LONDON PLAN  
REPRESENTATIONS ON BEHALF OF 313-349 ILBERTON ROAD LLP**

We write in respect of the above on behalf of 313-349 Ilderton Road LLP. The opportunity to comment upon the draft New London Plan is welcomed. Firstly we provide some background by way of introduction and subsequently provide representations on various aspects of the New London Plan where appropriate.

**Introduction**

313-349 Ilderton Road LLP is a subsidiary of the Aitch Group (hereafter 'Aitch'). Aitch is a dynamic commercial and residential developer with over 20 years' experience of delivering and managing a diverse property portfolio. Established in 1995, Aitch Group specialises in innovative development and has a proven track record of success.

Aitch take pride in their approach to planning and collaborative working and believe the team they have in place is one of their biggest strengths. Aitch Group has a commitment to sustainable development and of constructing buildings to the highest standards. Their portfolio comprises significant assets including offices, warehouses and residential homes. Aitch Group's planning and development projects currently include infill sites from one residential unit, through to key 500 unit mixed use schemes in the Thames Gateway Opportunity Area. Aitch have over 450 residential units and 100,000sqft of commercial space in planning and are currently on site constructing just under 500 residential units and 150,000sqft of commercial space.

**The Draft New London Plan**

Under the legislation establishing the Greater London Authority (GLA), the Mayor is required to publish a Spatial Development Strategy (SDS) and keep it under review. The SDS is known as the London Plan. As the overall strategic plan for London, it sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years.

The general objectives for the London Plan, and the process for drawing it up, altering it and replacing it, are set out in the Greater London Authority Act 1999 (as amended) and supporting detailed regulations. The Draft new London Plan should be developed in line with these requirements. The legislation stipulates that the London Plan should only deal with matters of

strategic importance to Greater London taking account of the principal purposes of the Greater London Authority which are:

- promoting economic development and wealth creation in Greater London;
- promoting social development in Greater London; and
- promoting the improvement of the environment in Greater London.

This London Plan will run from 2019 to 2041 and is a Replacement Plan. This means it is not an alteration or update to previous Plans. All of the other iterations of the London Plan from 2004-2016 have been alterations. Once adopted this Plan will replace all previous versions.

Consultation on the Draft London Plan runs from 1 December 2017 to 2 March 2018 before anticipated Examination in Public (EIP) in Autumn 2018 and adoption Autumn 2019.

### **Representations**

The representations to the Draft New London Plan are set out in the following paragraphs. The focus of our representations is the delivery of mixed-use schemes comprising housing and employment floorspace within Opportunity Areas along with a number of affiliated policies which are important to address.

#### ***Chapter 1 – Planning London’s Future (Good Growth Policies)***

***Policy GG2 Making the best use of land*** sets out criteria to create high-density, mixed-use places that make the best use of land.

We support the priority given to the development of sustainable locations particularly in respect of Opportunity Areas. We also support the potential to intensify the use of land through higher density developments. However, in light of the draft increase in objectively assessed housing need in London, the protection afforded to Green Belt and Metropolitan Open Land significantly restricts the delivery of housing at the required rate. The *Travel in London Report 10* prepared by TfL states that sustainable travel has increased from 52.0 per cent in 2000 to 62.1 per cent in 2016. Although this demonstrates that the trends in travel over the past decade or so have had the effect of progressively increasing the share for active, efficient and sustainable transport modes, it is contingent upon significant investment in relevant infrastructure. This is particularly prevalent in the outer Boroughs which accounts for the majority of trips in London, and whereby typically just over 50 per cent of journeys made are using sustainable modes. Intensification of the use of land through higher-density development can facilitate infrastructure improvement. Further, this places greater emphasis for higher densities in areas with existing or committed infrastructure improvements.

***Policy GG3 Creating a healthy city*** seeks to improve Londoners’ health and reduce health inequalities.

We support the principle of the policy but request further clarification on the requirements of Health Impact Assessment and its role within the planning system. This type of Assessment could prejudice the delivery of much needed housing and employment development where this creates an onerous and ambiguous burden upon the developer.

***Policy GG4 Delivering the homes Londoners need*** sets out criteria to create a housing market that works better for all Londoners.

We support the encouragement of housing development and the policy aim to identify and allocate a range of sites, with a focus upon deliverability. However, the stringent 50 per cent target delivery for affordable housing must be carefully assessed against viability and deliverability of development. The London Borough of Southwark for example currently preside over a 35 per cent target for affordable housing delivery which has been adopted following studies through the Development Plan evidence base. The upward provision totalling 50 per cent as suggested by the draft policy could seriously prejudice the delivery of development schemes and act as a deterrent to development thus conflicting with the overarching policy aim of “delivering more homes Londoners need”.

The Mayor’s affordable housing policy is assessed later in this Representation.

### ***Chapter 2 - Spatial Development Patterns***

**Policy SD1 Opportunity Areas** sets out the Mayor’s ambition to ensure that Opportunity Areas fully realise growth and regeneration potential.

The designated Opportunity Areas represent the primary focus for delivery of new housing and commercial development to meet increased demand. The Mayor’s support for this is welcomed, particularly regarding the commitment to “sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL”.

Increased housing and employment targets will only be achievable through strategic release and intensification of such designated land, particularly where other constraints (e.g. Greenbelt) remain in force as existing. It is necessary to note however that the proposed 50 per cent affordable housing requirement as a specific target for SIL sites could threaten many of the regeneration schemes when considering the abnormal costs associated with such development. Affordable Housing Policy is referred to in detail below.

As such we strongly support the principle of Opportunity Areas to enable the delivery of much needed homes and jobs for Londoners’. However we have reservations with the requirement to intensify the employment function of existing SIL sites where this may be unviable. The policy should be subject to viability testing.

### ***Chapter 3 - Design***

**Policy D1 London’s form and characteristics** sets out a list of criteria for development proposals to address relating to the form and layout of a place and development design.

The design principles included within the policy are generally similar to those set out in the adopted London Plan and as such we support the policy.

**Policy D2 Delivering good design** sets the processes and actions to help ensure development delivers good design. It includes reference to guidance on design reviews, including how panels and processes should be managed.

The wholesale avocation of the use of Design Review Panels must be initiated with some caution as this can prejudice development delivery through delay and/ or increased costs. Further, the process can obfuscate decision-making, particularly where the Design Review input is generated late on in the planning process.

It is suggested that an alternative is to emphasise the use of clearly stated and updated Design Guidance (through SPG) at a strategic level which is then referenced at a local level. This has the dual benefit of providing clarity for decision-makers and consistency for developers.

**Policy D3 Inclusive design** seeks to help to ensure the diverse needs of all Londoners are integrated into development proposals from the outset.

This policy is broadly similar to the adopted London Plan, however, it should be made clear that inclusive design implementation is secured through Building Regulations thus ensuring a consistent approach to development.

**Policy D4 Housing quality and standards** sets minimum space standards for dwellings of different sizes and provides guidance on minimum ceiling height, single/dual aspect dwellings, amenity space amongst other design standards.

This policy is broadly similar to the adopted London Plan and is therefore supported.

**Policy D5 Accessible housing** seeks to provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children.

The policy references Building Regulations and as such is supported.

**Policy D6 Optimising housing density** sets out that a design-led approach to optimising density should be based on an evaluation of the site's attributes, its surrounding context and capacity for growth and the most appropriate development form.

We support the flexibility in approach to the density range and support the requirement for exemplar design in instances the density range has been exceeded. The policy removes Table 3.2 Sustainable residential quality (SRQ) density matrix which should allow a more flexible approach to proposed density through the planning application system. This is supported as the increased housing and employment delivery will only be secured through increased densities in sustainable locations mindful of the protection afforded to Green Belt and Metropolitan Open land.

Presiding over a robust design strategy as referred above, allows for optimised housing density without recourse to a mechanistic approach based upon site area and proximity to public transport.

**Policy D7 Public realm** defines public realm as all the publicly-accessible space between buildings, whether public or privately owned, from alleyways and streets to squares and open spaces, including the Thames and London's waterways. The policy sets out measures for development proposals to adhere to.

The provisions within the policy are generally acceptable.

**Policy D8 Tall buildings** sets out that tall buildings have a role to play in helping London accommodate its expected growth as well as supporting legibility across the city to enable people to navigate to key destinations. To ensure tall buildings are sustainably developed in appropriate locations, and are of the required design quality, Development Plans and development proposals must undertake the following: Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in Development Plans the locations where tall buildings will be an appropriate form of development in principle, and should indicate the general building heights that would be appropriate, taking account of:

1. the visual, functional, environmental and cumulative impacts of tall buildings;
2. their potential contribution to new homes, economic growth and regeneration;
3. the public transport connectivity of different locations.

We support the plan led approach and requirement for assessment in respect of visual, functional, environmental and cumulative impacts. However, the Development Plan areas should not be prescriptive and as such we strongly promote a flexible approach to tall buildings in areas with a good access to public transport (PTAL 4 or above).

**Policy D11 Fire safety** sets out standards for new development proposals to meet in the interest of fire safety including: designed to incorporate appropriate features which reduce the risk to life in the event of a fire; are constructed in an appropriate way to minimise the risk of fire spread; provide suitable and convenient means of escape for all building users; adopt a robust strategy for evacuation which all building users can have confidence in; provide suitable access and equipment for firefighting which is appropriate for the size and use of the development. In this regard all major developments should be submitted with a Fire Statement which is an independent fire strategy, produced by a third party suitably qualified assessor.

Fire Safety and general safety of all buildings is extremely important, however, established Building Regulations already adequately deal with the safety performance of new buildings. This policy will result in a crossover of specialisms and will ultimately only serve to slow the delivery of new development.

**Policy D12 Agent of Change** sets out that the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new noise-sensitive development. Development proposals should manage noise and other potential nuisances.

The general principle of the Agent of Change policy is supported as noise sensitive development can be jeopardised by noise-generating activities. Increased mitigation influenced through the planning system will ultimately lead to intensification of land thus enabling growth.

**Policy D13 Noise** seeks to reduce manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by: reflecting the Agent of Change principle; mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development; separating new noise-sensitive development from major noise sources.

We support this policy in its current form.

#### **Chapter 4 - Housing**

**Policy H1 Increasing housing supply** sets out the ten-year targets for net housing completions which each local planning authority should plan for and Boroughs must include these targets in their Development Plan documents.

The principle of the policy is supported, especially the requirement for Boroughs to publish their housing delivery results annually, and encourage high density schemes in sustainable locations including Opportunity Areas. As referenced above, it is incumbent upon the provision of Opportunity Areas to maximise housing and employment output given the constraints of the plan led system.

**Policy H2 Small sites** sets out that small sites should play a much greater role in housing delivery and boroughs should pro-actively support well-designed new homes on small sites through both planning decisions and plan-making.

The policy is supported and is compliant with the overarching aim of the National Planning Policy Framework. Clear guidance emphasising the role that such sites play should be set out in order that this is referenced in subsequent local development plan policy. A minimum proportion of identified housing delivery targets for each borough should be set out for small sites, similar to the Brownfield Register of land.

**Policy H3 Monitoring housing targets** sets out that ten ten-year housing targets set out in Table 4.1 should be monitored.

We support the requirement for housing targets to be maintained on residential sites however these must be expressed as a minimum in accordance with NPPF Paragraph 47 and also the draft OAN guidelines published by the Government in September 2017, entitled 'Planning for the right homes in the right places: consultation proposals'.

**Policy H4 Meanwhile use** state that Boroughs are encouraged to identify opportunities for the meanwhile use of sites for housing to make efficient use of land while it is awaiting longer-term development.

We support the principle of this policy, however the Plan must take the opportunity to ensure development delivery is expedited.

**Policy H5 Delivering affordable housing** sets out the strategic target is for 50 per cent of all new homes delivered across London to be affordable.

We support the principle of affordable housing however it should be noted that any increase from the adopted viability thresholds within Boroughs Development Plans up to 50% can jeopardise development and viability testing should be accounted for in the determination of planning applications.

The policy will result in the Mayor's Affordable Housing and Viability SPG becoming policy which will prejudice the delivery of housing. The threshold approach, explored further below, sets out that applications must be "consistent with the relevant tenure split and meet all of the other relevant policy requirements and obligations" to qualify for Route B 35 per cent affordable housing. However, the requirement for the developer to meet all other 'requirements and obligations' will ultimately result in most schemes becoming unviable. The requirement of more extensive clawback mechanisms for schemes below the target threshold could also prove detrimental to housing delivery, particularly when review mechanisms are applied to all major applications, not just more complex and phased schemes.

It is specifically recommended that where planning applications are commenced within 2 years of the date of the consent and where this is delivered in a single phase no review mechanism is necessary. This provides certainty to the development industry and provides a clear focus upon the initial/ submission stage financial viability exercise. The move towards the review mechanism process undermines the initial stage Financial Viability assessment and represents a retrograde approach to a plan-led and front-loaded planning application system.

This is supported by the Royal Institution of Chartered Surveyors within the 'Financial Viability in Planning' Report (2012) which states that re-appraisal mechanisms should only be considered

in exceptional cases. The approach as proposed does not provide a robust or consistent policy and is therefore unsound in this regard.

**Policy H6 Threshold approach to applications** sets out the threshold approach which applies to development proposals which are capable of delivering more than ten units or which have a combined floor space greater than 1,000 sqm. The threshold level of affordable housing is initially set at:

1. a minimum of 35 per cent;
2. 50 per cent for public sector land;
3. 50 per cent for Strategic Industrial Locations, Locally Significant Industrial Sites and other industrial sites deemed appropriate to release for other uses (see Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function).

It further sets out the Fast Track Route of the threshold approach and the Viability Tested Route as already published within the Mayor's Affordable Housing and Viability SPG.

We do not support this requirement for 50 per cent affordable housing provision in areas designated as Strategic Industrial Land. This conflicts with the delivery of the housing and employment floorspace, particularly within Opportunity Areas. Such areas are critical in realising identified housing need and imposing a punitive and arbitrary increase in minimum affordable housing threshold is unsound, particularly where infrastructure requirements are also part-funded through development.

For example the London Borough of Southwark, where the adopted Development Viability SPD (2016) requires 35 per cent provision, maintains this headline level of affordable housing whilst introducing an increased CIL charge rate of £218 per square metre for the Bakerloo line extension. Together with the plan requirement for B Use class floorspace re-provision, the cumulative impact of this financial burden will prejudice the delivery of 20,000 homes in the Old Kent Rd Opportunity Area and Area Action Plan, where the policy requirement is increased to 50 per cent affordable housing. The financial viability testing that underpins the Southwark Plan demonstrates that the 35 per cent affordable housing provision represents the maximum viable level of provision .

In respect of the threshold approach, under Route B of the Affordable Housing and Viability SPG, the developer has to meet the 35 per cent threshold to avoid having to provide a viability assessment but the application must also be "consistent with the relevant tenure split and meet all of the other relevant policy requirements and obligations". This means a scheme under route B must meet all statutory and non-statutory requirements. The available evidence base demonstrates this is not possible and will result in all schemes proceeding via route A. In order to avoid this, it is imperative that a practical and viable policy level of affordable housing is specified in Strategic Policy.

**Policy H8 Monitoring of affordable housing** sets out that Boroughs are required to have clear monitoring processes to ensure that the affordable housing secured on or off site is delivered in line with the Section 106 agreement; Monitoring processes should ensure that any cash in lieu payments are used to deliver additional affordable housing; Boroughs should ensure that where a review mechanism is triggered, it is implemented and the number of extra homes delivered, or cash in lieu secured is recorded; Boroughs must publish monitoring information on A-C annually to ensure transparency in the planning process and so the public know how funds are being spent. This information should be shared with the GLA so it can be part of the annual monitoring process.

We support the principle of affordable housing monitoring and cash in lieu payments being used to deliver additional affordable housing.

**Policy H9 Vacant building credit** sets out that the Vacant Building Credit is unlikely to bring forward additional development in London, therefore in most circumstances, its application will not be appropriate in London.

We do not support the loss of Vacant Building Credit as this is not in accordance with national planning policy and guidance. The London Plan is therefore unsound as currently drafted in this regard.

**Policy H12 Housing size mix** states that to determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme.

We support the encouragement to pay regard to London Strategic Housing Market Assessment and, where relevant local assessments. However, there should be flexibility in unit mix which pays regard to site constraints and as such the provision of schemes with small units should not be universally restricted.

**Policy H13 Build to Rent** states that to recognise that the Build to Rent development model differs from a traditional for sale scheme and the potential role it can play in accelerating delivery, where a development meets the criteria set out below, the affordable housing offer can be solely Discounted Market Rent at a genuinely affordable rent, preferably London Living Rent level. Affordable housing should be secured in perpetuity.

The policy further sets out that for Build to Rent schemes to follow the Fast Track Route they must deliver at least 35 per cent affordable housing, of which at least 30 per cent should be at London Living Rent Level, with the remainder being at a range of discounts below market rent to be agreed with the borough and/or the Mayor where relevant. Schemes must also meet all other requirements of part C of Policy H6 Threshold approach to applications. This threshold and affordable housing tenure split, will be reviewed and if necessary updated in 2021, through Supplementary Planning Guidance.

We support the principle of a Build to Rent policy as this is an important instrument to delivering much needed housing. However, the minimum of 50 units, 15 year covenant and minimum 3 year tenancies all will restrict the provision and limit the delivery of units. Further, the threshold approach to affordable housing could seriously reduce the growth of the Build to Rent sector especially when the sector is relatively new and the viability of affordable housing provision is untested.

**Policy H18 Large-scale purpose-built shared living** sets out that large-scale purpose-built shared living Sui Generis use developments, where of good quality and design, may have a role in meeting housing need in London if, at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood, and it meets all the criteria outlined.

The support for purpose build shared living accommodation is supported however the weight given to this type of housing should be carefully managed and that the policy should support a balanced supply between this type of accommodation and conventional C3 Use Class development.



## **Chapter 6 - Economy**

**Policy E2 Low-cost business space** sets out that the provision, and where appropriate, protection of a range of low-cost B1 business space should be supported to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand; Development proposals that involve the loss of existing B1 space (including creative and artist studio space) in areas where there is an identified shortage of lower-cost space should:

1. demonstrate that there is no reasonable prospect of the site being used for business purposes, or
2. ensure that an equivalent amount of B1 space is re-provided in the proposal (which is appropriate in terms of type, specification, use and size), incorporating existing businesses where possible, or
3. demonstrate that suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and, where existing businesses are affected, that they are subject to relocation support arrangements before the commencement of new development.

The policy further states that development proposals for new B1 business floorspace greater than 2,500 square metres (gross external area) should consider the scope to provide a proportion of flexible workspace suitable for micro, small and medium-sized enterprises.

The protection of employment floorspace is supported the policy as currently worded is restrictive and the test 'in areas of identified shortage of lower-cost space' is ambiguous. It is therefore unsound and requires further clarification. The flexible approach to B2 business floorspace greater than 2,500 square metres is welcomed.

**Policy E4 Land for industry, logistics and services to support London's economic function** seeks to maintain a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be maintained.

The established principle of release and intensification of Strategic Industrial Locations (SIL) is supported but note that planning applications within the Opportunity Areas on designated SIL must prioritise the wider planning objectives in terms of delivering residential development,. The employment function of SIL should be managed through local development plan policy and based upon a regular / monitored position of demand for industrial uses, as identified below. Where supply of floorspace exceeds demand priority for re-use should be given to residential-led development.

**Policy E5 Strategic Industrial Locations (SIL)** sets out Strategic Industrial Locations (identified in Figure 6.2 and Table 6.3) should be managed proactively through a plan-led process to sustain them as London's main reservoirs of industrial, logistics and related capacity for uses that support the functioning of London's economy. Development proposals in SILs should be supported where the uses proposed fall within the broad industrial-type activities set out below:

1. light industrial (Use Class B1c);
2. general industrial uses (Use Class B2);
3. storage and logistics/distribution uses (Use Class B8);
4. other industrial-type functions, services and activities not falling within the above Use Classes including secondary materials and waste management, utilities infrastructure, land for transport and wholesale markets;
5. flexible B1c/B2/B8 premises suitable for occupation by SMEs;
6. small-scale 'walk to' services for industrial occupiers such as workplace crèches or cafés.

Development proposals for uses in SILs other than those set out above, (including residential development, retail, places of worship, leisure and assembly uses), should be refused except in areas released through a strategically co-ordinated process of SIL consolidation. This release must be carried out through a planning framework or Development Plan document review process and adopted as policy in a Development Plan or as part of a co-ordinated master-planning process in collaboration with the GLA and relevant borough.

### **Chapter 10 - Transport**

**Policy T1 Strategic approach to transport** states that Development Plans and development proposals should support:

1. the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041
2. the proposed transport schemes set out in Table 10.1.

Further, Policy T1 states all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

We support the strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041.

**Policy T3 Transport capacity, connectivity and safeguarding** states that development proposals that do not provide adequate protection for the schemes outlined in Table 10.1 or which otherwise seek to remove vital transport functions or prevent necessary expansion of these, without suitable alternative provision being made to the satisfaction of transport authorities and service providers, should be refused. In Development Plans and development decisions, priority should be given to delivering upgrades to Underground lines, securing Crossrail 2, the Bakerloo Line Extension, river crossings and an eastwards extension of the Elizabeth Line. Development proposals should support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed.

We support the priority provided to infrastructure projects such as the Bakerloo Line Extension and the development potential this will unlock.

**Policy T6 Car parking** sets out that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite').

The encouragement of car free development is welcomed and the minimum parking standards in outer London Boroughs within areas with PTAL 0-1 is also welcomed.

**Policy T6.1 Residential parking** sets out that new residential development should not exceed the maximum parking standards set out in Table 10.3. These standards are a hierarchy with the more restrictive standard applying when a site falls into more than one category.

This is policy is supported.

**Policy T6.2 Office parking** states that the maximum parking standards set out in Table 10.4 should be applied to new office development and in well-connected parts of outer London, including town centres, in close proximity to stations and in Opportunity Areas, office developments are encouraged to be car-free.

This policy is supported.

### **Conclusion**

The draft London Plan is unsound in certain areas and thus requires necessary amendments to policy, specifically with regard to affordable housing provision and development delivery within Opportunity Areas.

The re-provision of employment space should be focused upon the monitor/ release/ manage approach as established by previous strategic policy.

It is noted that draft revisions to the NPPF are proposed to be published imminently. Further amendments to the London Plan should also consider this and the implications for the emerging plan.

### **Moving forward**

Aitch reserves the right to be heard at Examination and requests to be notified when:

- The London Plan is submitted to the Examiner in accordance with Section 212 of the Planning Act 2008; and
- The recommendations of the Examiner and the reasons for these recommendations are published.

Yours sincerely,

ALUN EVANS  
Director