



ABERFELDY NEW VILLAGE LLP
Suite 401
The Spirella Building
Bridge Road
Letchworth Garden City
Hertfordshire
SG6 4ET

Introduction

Aberfeldy New Village LLP welcome the opportunity to comment on the draft London Plan (“draft Plan”) and we set out below what we consider to be constructive comments on the draft document that we hope will be taken on board. In our view, these are important to our ongoing regeneration work at the Aberfeldy Estate in Tower Hamlets.

Overall, we support the ambition to substantially increase housing delivery through ‘good growth’ and welcome the GLA’s continuing commitment to keeping the London Plan regularly updated. This is essential to ensuring that the Plan remains relevant in addressing the challenges facing London and is capable of taking advantage of emerging opportunities. We agree that it is necessary to rigorously and forensically examine potential new sources of supply to ensure that the current substantial shortfall between housing completions and housing need can be closed.

Outline planning permission for the Aberfeldy New Village was granted in 2012 for up to 1,176 new homes. Since planning permission was granted, development has proceeded quickly with phases one and two (561 new homes) already complete and with phase three (344 new homes) under construction. The New Village has already provided substantial new homes and we have ambitious plans for additional new homes on the remainder of the site. Aberfeldy is within the Poplar Riverside Housing Zone (designated in 2015) and in the proposed Opportunity Area within the draft Plan. We therefore welcome the draft Plan’s focus on increasing density through more efficient use of brownfield sites.

The proposed housing requirement represents a significant increase upon the current minimum target and is substantially above current completion levels, seeking a major step change in delivery over the next 10 years. It is rightly ambitious and we agree that it is necessary to rigorously and forensically examine potential new sources of supply to ensure that the current substantial shortfall between housing completions and housing need can be closed.

To deliver this vision additional housing supply will need to be identified, and crucially developed quickly. We consider that sites with existing planning permissions could play an important role in realising this vision as many already have developers on site and so revisions to the planning permissions and any associated uplift in housing can be delivered quickly. While we agree with the broad spatial strategy set out in the draft Plan, it is crucial that this is matched by a suite of policies which will be effective in delivering this planned growth.

Delivery is central to the planning system, and the NPPF (para. 173) sets out clear guidance on it

“Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.”

In our view the policies of the draft Plan, taken together with the draft charging schedule for MCIL2, further add to the burdens that are already faced by the industry in bringing forward development and



brownfield sites. Neither has been devised, in our view, with a robust evidence base on viability (the draft Plan and the draft Charging Schedule each have been tested separately and on a different basis for viability). We consider that changes are necessary to ensure that the draft Plan facilitates the desired uplift in delivery on sites across the capital, especially those well placed to deliver in the short term.

Review of Policies

We comment on specific policies in the following sections. Section 41 of the GLA Act states that the London Plan should be consistent with national policy and we note that the Inspector of the FALP made clear that while the London Plan is not a Local Plan it was reasonable and appropriate to apply the soundness tests of paragraph 182 of the NPPF. We consider that this approach remains appropriate to the examination of the draft Plan and assess the draft policies against this.

Targets for Growth

We broadly welcome the targets for growth set out in the draft Plan.

However, we have concerns over the methodology used to arrive at the objectively assessed need. The Government has set out guidance on how objectively assessed need should be assessed and has recently consulted on proposals for a new standard methodology (*Planning for the Right Homes in the Right Places*), which is set to be implemented once the revised NPPF is published. There is a need for a consistent approach across authorities in assessing housing need and this is particularly so given that London's housing market is closely related to that of the wider southeast.

Failure to ensure consistency results in households being missed and leads to affordability pressures. The median house price to median earnings ratio across London is 15.4, with some boroughs significantly exceeding this and overcrowding has increasingly become commonplace in London and is evidenced by the increasing average household size.

The National Planning Practice Guidance (NPPG) (ID: 2a-015) states that the DCLG household projections should form the demographic starting point. In this policy context and particularly given London's relationship to the wider southeast it is not considered that this deviation from policy guidance is appropriate. The figure used in the 2017 SHMA arrives at a demographic starting point of 48,200 households per annum, substantially lower than the 54,000 using the 2014 SNPP projections. As a minimum the London Plan should use the SNPP figures as the starting point, but the implications of the standard methodology should also be considered as it is likely to be implemented before the draft Plan is submitted. If this is the case the standard methodology OAN should be used.

On this basis, London's objectively assessed housing need is likely to be substantially higher than the 66,000 figure in the 2017 SHMA. The NPPF objective is that Plans should meet the OAN in full and it is essential that the OAN which informs the housing requirement is robust.

Paragraph 1.4.3 (Delivering the homes Londoners need) is therefore unsound as it is inconsistent with national policy.

Increasing Housing Supply (H1)

The measures set out within this policy provide a logical approach to delivering intensification of development sites, which is supported. However, the identified supply in the SHLAA which provides the basis of the housing targets is insufficiently robust and accordingly the policy is not effective as it has not been demonstrated that it could be delivered over the plan period.

Given the short time period it will be important that supply from sites with extant planning permissions, particularly those with developers already in place is maximised. The potential cumulative contributions from S.73 applications and amended planning permissions could make a



reasonable contribution to increasing housing supply quickly. The draft Plan must ensure that planning policy does not adversely impact upon the delivery of new development by creating cumulative costs which threaten viability or discourage re-engagement with the planning system to optimise density on sites which already benefit from planning permission.

Policy SD1 Opportunity Areas

We support the designation of Poplar Riverside as an Opportunity Area. We note that the description states that it includes the Poplar Riverside Housing Zone, within which Aberfeldy is located, on the Tower Hamlets side of the River Lea (2.1.44). We consider that Poplar Riverside has significant potential for the delivery of new housing and support its designation in the Plan. We consider that the maps which cover the Aberfeldy Village (2.7 and 2.11) are insufficiently clear in designating it as within an Opportunity Area. They should be amended accordingly or supplemented with appendices clearly showing the areas.

Affordable Housing (Policy H6)

We understand the introduction of a single threshold to create consistency and certainty across London. However, the viability of sites will differ and appreciation of this in policy is particularly important given the increasing emphasis on intensification of existing uses, for which there is limited precedent.

We consider that Part C of the policy is overly complicated and conflates a number of issues such as wider policy compliance and tenure mix. There are very few schemes approved in London that meet all requirements in full, as a balance always has to be struck between meeting various objectives, especially on complex brownfield sites. We suggest the following changes (in bold and strikethrough):

*“2) be **broadly consistent with the relevant tenure split (Policy H7 Affordable housing tenure), or locally adopted alternative;***

~~3) meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant”~~

We consider that Part E of the policy relating to the ‘Viability Tested Route’ is overly onerous and is incompatible with the NPPG and the RICS Financial Viability in Planning Guidance Note (2012). Viability reviews increase development uncertainty and can impact upon financing of developments and forward-funding of built to rent developments. The review represents an ‘unknown factor’ to which lenders will usually take a worst-case position on. Increased use of viability reviews could therefore impact upon funding, adversely affecting delivery.

The NPPF is clear that the plans must be deliverable and that “the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened”. The NPPG (ID: 10-015) states that

“Viability assessment in decision-taking should be based on current costs and values. Planning applications should be considered in today’s circumstances.

However, where a scheme requires phased delivery over the medium and longer term, changes in the value of development and changes in costs of delivery may be considered. Forecasts, based on relevant market data, should be agreed between the applicant and local planning authority wherever possible.”

The blanket requirement for viability testing, regardless of the size of the proposed development or whether it is set to be delivered in phases is not consistent national policy. The NPPG makes it clear that viability testing should be done upfront unless there are clear reasons why delivery may be over



the medium to long term. This adds further unnecessary uncertainty to what is inherently an uncertain process. The policy as currently worded will negatively affect the delivery of the plan. We propose the following changes are made to make the policy consistent with national policy, as it is required to be in paras. 151 and 182 of the NPPF:

2) **where appropriate** viability tested schemes will be subject to:

a) an Early Stage Viability Review if **development has not commenced** ~~an agreed level of progress on implementation is not made~~ within two years of the permission being granted (or a **longer** period agreed by the borough)

~~b) a Late Stage Viability Review which is triggered when 75 per cent of the units in a scheme are sold or let (or a period agreed by the borough)~~

c) Mid Term Reviews prior to implementation of **the later** phases for larger phased schemes

These changes would ensure that this element of the policy is sound. The whole policy is overly prescriptive given the strategic nature, and as it will apply to all schemes over 10 dwellings LPA's should have the ability to consider its applicability in their areas and be given flexibility over its application.

By referring to a clearly definable milestone (commencement of development) part (a) satisfies the requirement of paragraph 154 of the NPPF for policies to provide a clear indication of how the developer should react.

Part (b) should be removed as it is wholly inconsistent with the NPPG, as it takes no account of the size of a development or its intended build out period.

The changes to part (c) give greater clarity to the policy. It clearly would not be consistent with the NPPG to require viability reviews on phases commenced soon after permission is granted.

With regard to part D it is not clear why a further viability review would be required after 2 years. If a development qualifies for the fast tracked approach and is therefore fully policy compliant it is unclear what the purpose of a viability review would be given there would be no scope for upward revision.

We consider that Part H as currently worded could have unintended consequences which affect delivery. To deliver the required housing supply over the 2019-29 period, particularly over the first five years, the draft Plan is heavily reliant on sites with extant planning permission. Many of these are larger sites which will be delivered in phases.

Over the implementation period of these sites, which can be many years for the largest, it is normal and understandable that developers need to modify permissions and sometimes may seek to redesign later phases to optimise a site's potential. S.73s can assist in boosting housing delivery quickly, particularly if developers are already on site and can provide improved designs. They should not be inadvertently discouraged.

Larger sites regeneration will be subject to substantial up front infrastructure cost commitments and involve distribution of uses throughout the phases, affecting cash flow and making for complex viability considerations. The risk associated with substantial upfront investment in infrastructure, community and amenity uses should not be ignored when reviewing viability on schemes for additional development.

The wording of this part of the policy is currently unclear. The inclusion of the requirement for viability information "*where an application is submitted to vary the consent and this would alter the economic circumstances of the scheme*" does not provide a clear indication of how the decision taker should react as 'economic circumstances' is a vague term. It is therefore not consistent with para. 154



of the NPPF. Such uncertainty creates additional risk which adds to the costs of borrowing which in turn adversely impacts upon delivery.

While it is recognised that where there is a significant uplift in the homes to be provided through a S.73 application, there is a need to review the level of affordable housing, this review should be ring-fenced around the uplift and not re-appraise the whole development. Such an approach would be overly onerous and impracticable discouraging reviews of developments which could yield additional houses and improved designs. The policy as currently worded is therefore not effective as it would curtail opportunities for new development and design improvements by increasing the risk associated with S.73 applications. We consider it should be amended as follows

*“For schemes where the original permission did not meet the threshold ~~or required tenure split~~, viability information will be required where an application is submitted to vary the consent **and this would result in a net increase of 10 or more dwellings which would not meet the relevant threshold.** ~~would alter the economic circumstances of the scheme.~~ **The housing uplift for such cases will be assessed under the Viability Tested Route. It will not be necessary in such cases to review the overall viability of the development.**”*

These changes will ensure the policy is consistent with national policy and is effective in achieving the development aims of the plan by.

Tenure Split (Policy H7)

We consider that the precise split included within this policy is overly prescriptive given the strategic nature of the plan and varied priorities of the boroughs. Some flexibility should be built in to reflect location, site characteristics, viability and the passage of time. The NPPF (Paragraph 14) states that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. In this regard we propose the following changes:

*A The Mayor is committed to delivering genuinely affordable housing. ~~The following split of affordable products should be applied to development:~~ **development should be in general accordance with the following standards, or in accordance with a locally defined alternative split:***

- 1) ~~a minimum of 30 per cent low cost rented homes, allocated according to need and for Londoners on low incomes (Social Rent/ London Affordable Rent)~~*
- 2) ~~a minimum of 30 per cent intermediate products which meet the definition of affordable housing, including London Living Rent and London Shared ownership~~*
- 3) 40 per cent to be determined by the relevant borough based on identified need, provided they are consistent with the definition of affordable housing.*

These minimums will be reviewed in 2021, and if necessary, updated ~~through Supplementary Planning Guidance.~~

~~B Only schemes delivering the threshold level of affordable housing with a tenure split that meets the requirements set out in part A can follow the Fast Track Route for viability.~~

Part B repeats the requirements of Policy H6 and this repetition should be removed. Furthermore, amending the tenure split would need to have regard to viability. Accordingly, this would require a change of policy which should be subject to rigorous viability testing and examination, not the reduced level of consultation required for an SPG which provides additional information to guide interpretation of a policy, not change it.



The policy as currently worded is unnecessarily rigid and does not provide adequate flexibility to respond to change as the NPPF (para. 14) requires. This level of prescriptive detail is not justified and is unlikely to be effective, particularly given the strategic level of the draft Plan. I should be modified as suggested above.

Redevelopment of existing housing and estate regeneration (Policy H10)

We are working alongside Poplar HARCA, a housing association, on the ongoing regeneration of the Aberfeldy Estate in Tower Hamlets. From our experience we would fully agree with the Mayor that estate regeneration has significant potential to deliver environmental benefits, new community facilities and a significant uplift in housing, adding to the viability of local businesses and vitality of community spaces and facilities.

We support the aims of estate regeneration set out in Policy 4.10.2. We would suggest the following addition to the list “*where possible constructing net additional high quality new homes to help meet London’s housing needs*” this is compatible with and could assist in realising the three current aims. It is also compatible with the Mayor’s wider spatial vision.

The potential benefits of estate regeneration are substantial and varied. New development will be high quality, providing improved insulation, along with new community facilities and amenity spaces. It can deliver important socioeconomic improvement and qualitative improvements to the environment. Each housing estate is different and any redevelopment whether partial or complete will face a unique set of challenges.

It is important that local decision-takers can fully assess proposals in the round and consider overall viability of bringing such schemes forward. We support, in principle, the requirement to obtain the maximum viable affordable housing delivery through estate regeneration and are committed to providing a range of affordable housing tenures. However, we consider that the number of dwellings is a more relevant comparison than floorspace. The requirement for re-provision of floorspace of the same tenure may not be viable and so could prevent regeneration coming forward in some cases, even if it was locally supported. It is important that a holistic approach is taken considering in full the wide ranging benefits that estate regeneration can provide.

The approach to estate regeneration should therefore be deferred to the LPAs in line with their own Borough wide housing strategies and within the reasonable parameters on maximising affordable housing and increasing housing delivery within their Borough. In this way they can consider the appropriate tenure split having regard to their own particular local circumstances. It is important that the policy guarded against unintended consequences. It should not prevent the redevelopment of estates where this could lead to significant improvements in the quality of homes, improved facilities and net additional homes.

We would suggest that the text for Part C is amended as follows:

*“For estate regeneration schemes the existing affordable housing ~~dwellings floorspace~~ should be replaced on an equivalent basis i.e. where social rented ~~dwellings floorspace~~ is are lost, # they should be replaced by general needs rented accommodation with rents at levels based on that which has been lost, and the delivery of additional affordable housing should be maximised. **Where this cannot be viably achieved or where the local Housing Strategy indicates that a different approach is appropriate under the local circumstances, alternative arrangements can be agreed with the LPA, following consultation.** All schemes should follow the Viability Tested Route (see Policy H6 Threshold approach to applications).”*



These changes provide room for local interpretations of the policy within the strategic framework. This will allow LPA's sufficient scope to local circumstances while being in general conformity with the London Plan as required by the GLA Act 1999.

Policy H13 (Build to Rent)

We welcome the inclusion of a policy on Build to Rent within the draft Plan. Institutional investment in the private rented sector is growing and it provides a complementary product to traditional for sale housing which can speed up delivery rates. This aspect of it is particularly compatible with the Mayor's ambitious growth targets. The viability assessment requirements for Build to Rent should not adversely impact upon delivery. In this regard future viability assessments on BtR developments, other than a pre-implementation review, are not appropriate or workable for BtR developments and should be specifically excluded.

Build to Rent deals are usually forward funded by a future asset owner or are sold during the development period. Under both of these scenarios the asset owner/investor is looking for certainty of return and is taking market risk. They will be providing a fixed level of capital based on a long-term view of how the asset will perform. It is, therefore, not appropriate for a review to be undertaken after a short period of time and for any uplift to be shared as there may be issues affecting the performance of the asset over its lifetime on which the asset owner will have taken a view. In addition, the investor/asset holder will not have allocated additional capital to cover such an eventuality and the developer will have sold the asset and no longer have any involvement in the development.

Part D of this policy should go further than recognising the differences between Build to Rent and Build for Sale development and explicitly state that post commencement viability reviews will not be sought on Build to Rent deals. This is necessary to make the policy effective.

Policy G5 (Urban Greening)

We recognise the important benefits associated with green infrastructure in our schemes and public realm and amenity space are key components for us in terms of place making. However, the application of an urban greening factor is a further technical hurdle that only adds to the requirements for already difficult and costly major regeneration projects.

The creation of successful public and private amenity spaces is heavily dependent on their individual design and local circumstances and there is a risk that by setting out further standards to be met, otherwise appropriate and innovative solutions would be prevented from coming forward. It is essential that the planning system in application determination can interpret the plans that are submitted and gain a clear appreciation of how a development may be used/ lived in. Development planning and management both have to be sensitive to the costs that additional policy burdens ultimately place on occupiers.

We are also concerned that failure to achieve the factor requirement will be used by boroughs to refuse otherwise acceptable high density development.

The viability appraisal has not properly tested the costs of delivering urban greening. Appendix H of the Viability Assessment Technical Report states that the costs of urban greening measures have been included in the external works costs. However, these are based on existing developments and therefore it is unlikely that the costings will reflect these new draft policy requirements. To achieve an Urban Greening Factor (UGF) of 0.3 in central London, this may mean creating an extra floor for services' equipment to enable the roof to be fully greened. This could well amount to a substantial expense which will clearly impact on a development's ability to meet other obligations within the plan. It is also unlikely to be achievable for developments involving listed buildings or within Conservation Areas.



The evidence base of the draft Plan has not adequately demonstrated that the policy as currently worded is viable or considered the impact of increased development costs on fulfilling other Plan policy requirements e.g. in relation to affordable housing, nor on deliverability. The policy is therefore not consistent with national policy (NPPF, paragraph 173) and risks being ineffective, we consider it should be amended as follows:

*“Boroughs should develop an Urban Greening Factor (UGF) **policies, tailored to local circumstances**, to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends suggests a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development, **subject to consideration of viability, design, heritage and other planning policy objectives, including deliverability.**”*

Policy D1 (Design)

Policy D1 is overly conservative especially in the context of the acute housing shortage London faces and the Mayor’s strategy to address this through intensification on previously developed land. With a bold new spatial strategy which seeks a doubling in housing completions there must be scope to allow high quality designs which redefine the local context while providing the uplift in housing and workspace the capital needs. This is particularly so in areas of average or poor environmental quality. While designs should have regard to the local context this should not mean that it must match existing styles and form to be acceptable, nor should it be possible for the policy to be interpreted in this way.

“B Development design should:

***have regard** respond to local context **in the design of new developments** by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions. **Where appropriate development can also set its own context provided it is of a high-quality design.**”*

These changes ensure the policy is not overly conservative in its approach and better align it with the Mayor’s strategy to realise a major step change in delivery of workspace and new homes. In some circumstances simply reflecting the local context will be inappropriate. For instance the Mayor’s plans for significant intensification around transport nodes through the development of small sites will not be possible if new designs are required to be of similar form and design of the detached, semi-detached or terraced homes they replace. The same would to areas in need of comprehensive redevelopment.

The changes above would ensure the policy is more effective in delivering the Mayor’s spatial strategy by recognising that maintaining similarity with the surrounding context may in some cases be neither appropriate nor desirable.

Policy D2 Delivering Goof Design

We support the ambition set out in Part B of this policy to ensure the most efficient use of land is made so that development on all sites is optimised. However, the draft Plan should not result in planning decisions taking even longer than they do already, such an outcome would place the delivery of the Plan in jeopardy.

In this regard parts E and F should be deleted. Not all authorities will have the officer time available to undertake this level of design review and it will slow down the planning process.



Policy D6 Optimising Density

We support the overarching aim of this policy, to make the most efficient use of land. However, the policy should be clearer in explaining that the mayor is seeking a major step change in the delivery of housing and business space and that increases in density will be necessary to achieve this.

Part A of policy D6 should be amended to make clear that higher density development will be expected in town centres, close to transport nodes, in opportunity areas and on major regeneration and redevelopment sites. It should be amended as follows

*“Development proposals must make the most efficient use of land and be developed at the optimum density. **Higher density development will be expected in town centres, close to transport nodes, in opportunity areas, housing zones and on major regeneration and redevelopment sites.** The optimum density of a development should result from a design-led approach to determine the capacity of the site.”*

The draft Plan sets out an overarching ambition for significantly increased densities. This change is necessary to make the policy effective as it must be clear where significantly higher densities are envisaged, otherwise this cannot be clearly interpreted by Local Plan makers and decision-takers.

We also consider that the policy should provide further guidance on what would constitute optimum densities. They Mayor may wish to consider setting minimum densities. In particular for areas where substantial new development is encouraged such as opportunity areas, housing zones and major regeneration sites, the supporting text should explain that the Mayor expects development in these areas to significantly increase housing densities in order to facilitate the delivery of the draft Plan.

Policy D8 Tall Buildings

It is important that tall buildings are thoroughly assessed and we support the intention of this policy. However similarly to our concerns in relation to policy D1 it is important that the policy is not misunderstood or misapplied in such a way which prevents development on the scale which is required in London. In this regard we propose some changes:

Part A should be amended to provide a better indication of what may reasonably be considered a tall building. It should include some of the supporting text from paragraph 3.8.2, which provides further useful information which should be included within the definition for clarity and to ensure the policy is effective, as set out below.

*“~~Based on local context,~~ Development Plans should define ~~what is considered~~ a tall buildings as **those substantially taller than their surroundings and cause a significant change to the skyline, the height of which may vary in different parts of London. In large areas of extensive change, such as Opportunity Areas, definitions of tall buildings should relate to the evolving context**”*

We broadly support part B as tall buildings could be appropriate in a number of locations and this should not be restricted. Some areas, even if the PTAL rating is currently low may have an urban fabric capable of accommodating taller buildings. In this regard we welcome the removal of the density matrix. However, the development potential of major regeneration sites in particular must be fully realised as such sites are scarce and have the potential to deliver transformative change which significantly boost density to levels appropriate to meet the capitals development needs. We therefore propose the following change to part B



*“B Tall buildings should be part of a plan-led approach to changing or developing an area. **The CAZ, opportunity areas, housing zones and major redevelopment sites will, in principle, be appropriate for tall building. In addition** 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 (set out in part C below)*
- 2) their potential contribution to new homes, economic growth and regeneration*
- 3) the public transport connectivity of different locations.”*

London will require tall buildings to deliver the intensification of uses the Mayor is seeking within the draft Plan. Furthermore the draft Plan seeks an immediate step change in delivery, it should not defer all consideration of tall building locations to Local Plans, given that there are a number of areas (included above) which have already been agreed, following consultation, as suitable for substantial new development. This change is necessary to make the policy effective.

Part C (d) is not consistent with Policy HC1 and the NPPF. The heritage impact test should not be different for tall buildings (however defined) than for any other development. If a development was considered to harm heritage assets this harm should be weighed against the benefits as set out in para. 134 of the NPPF. It should not be refused simply due to the existence of harm. This element of the policy should be amended as follows

*“D8(c)1(d) d) Proposals should take account of, and **seek to** avoid harm to, the significance of London’s heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area”*

This will ensure it is consistent with national policy and further that the draft Plan is internally consistent. The amended wording above is consistent with policy HC1(C) of the draft Plan.

Conclusion

We are pleased to have had the opportunity to comment on the draft Plan and welcome the work done to date by the GLA to ensure that the London Plan continues to remain up to date.

The draft Plan is rightly ambitious and overall we support the growth targets and overall spatial strategy set out to achieve them. In the case of some policies discussed above, we consider that modifications are required to ensure they are consistent with and do not inhibit the overall growth objectives of the Plan. Some changes are also required to ensure policies are consistent with national policy. For this reason we do not consider the draft Plan is sound in its current form, but believe it can be made so with the modifications set out above.

Ben Ffoulkes-Jones, Project Director