

Arcadis LLP comments

Page: Chapter 1 Planning London's Future (Good Growth Policies)

Section: N/A

Chapter one. Planning London's Future.

Given that the Good Growth Strategy has already been subject to consultation, we have limited our comments to the wider context of the overall London Plan. Taken in totality, the objectives of the Good Growth Strategy are well-founded. Through application of the principles of Good Growth, the GLA must ensure that growth engines are maintained and also that communities that will be most affected, through selective densification or strategic investment in transport and housing have an appropriate voice in the development of the implementation roadmap.

Specific points that we raise in connection with the 6 good growth policies are:

- Make best use of land. By opting to support densification of existing places rather than development in green field locations such as the Green Belt, the GLA must put in place appropriate policy to safeguard the character of these places. We support the GLA's emphasis on 'good growth by design'. The value of place-making as a part of the regeneration of parts of London over the past 10-15 years is well established. As development is directed towards locations with a potentially fragmented ownership, measures must be put in place to ensure that the discipline of making best use of land does not come at the expense of coherent, well-funded placemaking that meets the needs of existing and future residents.
- Delivery of the homes that Londoners need. Given the scale of the housing delivery challenge, this good growth policy does not appear to have access to all tools necessary to transform housing delivery – particularly with respect to the revised target for 43,000 affordable homes per annum. Given that GLA do not have powers, tools or resources to be able to drive the proposed step change in housing delivery, our view is that the policy needs to be more ambitious and more transformational with respect to the delivery of housing in the capital. Areas where additional means could be considered include:
 - Further development of thinking around the development of a pan-London housing delivery market;

- Specific measures with respect to the expansion of the role of public sector providers in the delivery of housing
- Consideration of planning incentives to encourage a diversity of tenures including long-term institutional rent
- Growing good economy. The principle of using the principles of the London Plan to encourage the wider sharing of the benefits of growth is appropriate. However, the Draft London Plan must take care when setting provisions for the decentralisation of growth not to drive investment into low-potential locations, or alternatively to add cost to development targeted at creating mixed-use assets that serve no obvious market. Ultimately, development in commercial space must be driven by evidenced demand rather than a predict and provide model. As the GLA becomes more ambitious with respect to policies aimed at directing growth into specific locations, it must also recognise that these policies should be applied flexibly, both by the GLA and by London Boroughs.
- Good growth as a part of the resilience strategy. Given the scale of change that is likely to occur during the currency of the draft plan, our view is that the resilience section of the plan needs to be far more ambitious. We would have liked to have seen a scenario-based approach to the resilience strategy – recognising that this element of the draft plan has to deal with a huge range of potential outcomes. Areas where we would like to see the adoption of a more extensive range of scenarios include:
 - Alternative pathways to a zero-carbon economy and their potential impact on growth – particularly given the need to maximise the wider social benefits of growth;
 - Modelled scenarios for the growth impacts of the smart city and digital economy – e.g. impact on business location, working and commuting patterns, tax take etc

Elements requiring further development

- Smart city dimensions of good growth. We understand that a digital strategy is being developed in parallel to the Mayor's Draft Plan. We believe that this digital strategy must underpin the principles of good growth, given that continuing development underpinned by digital will have impacts not only on business models but also on how services and social infrastructure underpinning good growth are delivered to stakeholders. In our view, the draft plan cannot be finalised until the recommendations of the digital strategy have been integrated. In particular, we would like to see the integration of technology, data and transaction road-maps into the Plan so that the timing of innovation can be used to influence key decisions in spatial planning.

- Alternative organisational structures for London. Given the huge changes that are expected to occur in business models and physical and social infrastructure during the period of the Draft London Plan, we would expect that there should be some discussion as to whether the current Government model for London is appropriate and whether the delegation of powers, upwards, downwards and across Central Government, GLA, London Boroughs and other public bodies could be reorganised to support the delivery of good growth. Given the extent of innovation seen with respect to the adoption of powers in other devolved authorities, this seems to be a missed opportunity. Whilst we appreciate that the plan is not the ultimate platform for the initiation of reform to organisational structures, we would expect to see a ‘place-marker’ for GLA to initiate some of these discussions as part of the plan formulation and implementation process.

Page: [Introduction to Chapter 2](#)

Section: [N/A](#)

We consider that the Consultation Draft presents an extensive document above what would historically be expected to form a Strategic Plan but in some cases, we would encourage further clarity to be provided on some of the key policies.

At its core, the Draft Plan promotes the principles of ‘good growth’ through appropriate spatial development patterns, leading to a healthy community and this overriding principle is supported.

Page: [Policy SD1 Opportunity Areas](#)

Section: [N/A](#)

Spatial development has to address mixed land uses and we welcome the Draft Plan's approach to employment generation. We specifically support the identified Opportunity Areas, comprising brownfield land and surplus public sector land – identified for key growth. However, we question whether the extent of details presented allow any flexibility on the part of individual Boroughs

Page: [Policy SD2 Collaboration in the Wider South East](#)

Section: [N/A](#)

We welcome the analysis presented on the Wider South East region and the relationship of the hinterland around London reflecting employment and housing.

However, we find the reference to the requirement to collaborate is presented in such a way that may be over confrontational to surrounding LPAs and would welcome a more nuanced and collaborative approach

We further believe that the stance against any review of the Green Belt is limiting and that more latitude to re-visit this view should be included.

Page: [Policy SD3 Growth locations in the Wider South East and beyond](#)

Section: [2.3.3](#)

We note the evidence base used to support the proposed approach and the targets presented to individual Borough in terms of house building. We further note that of the circa 66,000 new homes to be constructed pa, Newham, Tower Hamlets and Greenwich have the highest targets to reach over the next 10 years, with Croydon, Barnet and Ealing expected to make the most of its smaller sites accommodating 25 units or fewer. We would wish to review the evidence base in more detail in due course

Page: [Policy SD4 The Central Activities Zone \(CAZ\)](#)

Section: [N/A](#)

Whilst we acknowledge the need for targeting and supported residential development across the Capital, we accept the principle for Central Activity Zones where individual Boroughs will be encouraged to focus on commercial development, to support existing centres. Future potential reserve locations for CAZ office functions in Stratford and Old Oak Common are supported but it is unclear whether low cost business space and affordable workspaces, to be promoted via s106 agreements, will be dependent on viability evidence.

Page: [Policy SD4 The Central Activities Zone \(CAZ\)](#)

Section: [2.4.18](#)

We support Strategic Industrial Locations and Locally Significant Industrial Sites (SILs and LSISs) which are to be promoted for intensification/co-location and substitution, and the Strategic Areas for Regeneration

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Page: [Policy SD5 Offices, other strategic functions and residential development in the CAZ](#)

Section: [N/A](#)

Spatial development has to address mixed land uses and we welcome the Draft Plan's approach to employment generation.

Page: [Policy SD9 Town centres: Local partnerships and implementation](#)

Section: [2.9.5](#)

Support - We support this objective. We believe however that, here and across this whole section, the opportunity presented by collaboration with the private sector is under-discussed and regeneration outcomes would be supported by provision of further clarity on expectations for such partnerships

Page: [Policy SD10 Strategic and local regeneration](#)

Section: [N/A](#)

Neutral -

We support the plan ambition for regeneration and welcome the alignment between spatial, social and economic regeneration activity.

We believe that the interplay between transportation and regeneration should be given greater emphasis, particularly in regard to nodal regeneration and the use of this to promote the poly-centricity that is referenced as an aspiration in the plan.

We further believe that the role of private sector land-owners, developers and investors is under-discussed within the plan. An opportunity for clarity and guidance exists, should this topic be appropriately addressed.

Page: [Chapter 4 Housing](#)

Section: [N/A](#)

We fully endorse the aspirations set out for housing in the draft London Plan. We do however have significant concerns that the detail and control that the plan then goes on to describe will not increase delivery, but if anything is likely to blight development and therefore reduce the delivery of new homes across London. The plan is trying to set a new vision that is reliant upon a wholesale re-evaluation of land value and development. If this wholesale change is to be achieved there can be only one outcome and that is a lost cycle of development. There are many opportunities to promote the increased development of new homes and the plan has in many instances been successful in identifying the opportunities, however, it falls short of promoting these opportunities through adding layers of complexity and control.

The aspiration to deliver more new homes across London than at any time since the 1930's without considering a review of the Green Belt will be simply unachievable.

If the mayor is to succeed in increasing delivery of all tenures by number, much of the complexity needs to be removed. Decide on the overall aspiration and let the market and the boroughs work out how best to achieve the goals.

Page: [Policy H1 Increasing housing supply](#)

Section: [N/A](#)

Policy H1

The plan sets an ambitious target of 66,000 homes per which is approximately double that of current delivery and far exceeds the maximum number built at any time since the 1930's. The plan then goes on to set out a 10-year plan to achieve these targets by Planning Authority based on the SLHAA.

Whilst we endorse the approach of setting targeted numbers by location as the only way of achieving those aspirations we are concerned that some of the assumptions are unrealistic. The onus will be on Boroughs to develop delivery focussed plans that achieve the targets but ask them to rely on 'proactive intervention in London's land market'. For this to have any impact, clear powers will need to be available as well as the desire and the capacity to implement these powers. History has demonstrated this to be a protracted and ineffective process, we do not believe that it is a realistic or implementable aspiration.

We agree that tackling the construction skills gap and modernising methods of construction are essential to increasing capacity. The skills gap requires significant investment in time, money and culture to tackle this industry wide and create a new generation of tradesmen. Construction needs to become an aspirational profession not a 'make do' stop gap. The Mayor needs to target investment in strategic off-site facilities with appropriate transportation plans along with appropriate regulation and approval of precision manufactured solutions to ensure mortgage-ability and wider investor and public acceptance of these solutions.

We support the approach of optimising suitable brownfield sites. We are concerned that this will not bring enough land forward to meet the numbers. To double output without a strategic review of Green Belt land is completely unrealistic. Further, the costs associated with bringing many brownfield sites forward are prohibitive and the threshold approach will not be met in the majority of instances.

Planning Authorities should be allowed to review their Green Belt through the local plan review process and consider their own strategic solution to land classification and assembly to achieve their targets

Page: [Policy H2 Small sites](#)

Section: [N/A](#)

Policy H2 Small Sites

We endorse the approach of the policy to increase the impact of small sites. The main barriers to this aspiration will be the availability of the appropriate supply chain and the availability of finance.

The delivery of many small sites actually puts more pressure on a supply chain that is already at capacity, it is a more intensive form of development than large scale development and will therefore create a need for even more capacity in the sector. Part of the issue that small sites do not lend themselves to off-site manufacture as it is very difficult to achieve a competitive cost without volume. We would urge the Mayor to consider a range of standard unit layouts that would enable volumetric constructors to achieve volume efficiency. This will be key to the policy working or not.

The mayor should also consider an appropriate funding mechanism for the developers of small sites and precision manufacture that would enable both the SME sector and the Precision Manufacture sectors to develop into sustainable sectors.

Policy H5 Delivering Affordable Housing

The requirements set out for affordable housing are more onerous than those currently set out and particularly onerous for public sector land and Strategic Industrial Locations. To achieve these requirements will impact scheme viability and therefore ultimately result in an adjustment of land value. This creates uncertainty going forward and puts more pressure on land already owned. The practical result of this will be a slowdown in overall development and activity which will diminish the number of total new homes delivered and thus the number of affordable homes delivered.

Mixed tenure communities are essential to ensure that we do not re-create the environments for social deprivation that we are currently trying to replace and regenerate.

There should be greater flexibility in the plan that will promote development if there is a real intention to increase the total number of homes delivered across the London.

Policy H6 Threshold approach to applications

Whilst we endorse the principle of a threshold approach to simplify and speed up the approval process, we believe that the requirements are too onerous and will result in a situation whereby all schemes will proceed on a Viability Tested Route which is no different to the current position. Until the affordable housing requirements are locked into land value there will be a stagnation in the delivery of schemes and hence new homes. On the basis of the viability expertise that we have within our residential sector, we cannot foresee any situations where schemes will currently be able to proceed on the basis of the Threshold approach.

In relation to 4.6.6, we do not believe that the vast majority of industrial sites will be able to support 50% affordable housing due the costs associated with bringing these sites into a developable position.

4.6.13 appears to suggest that Boroughs may wish to increase the 35% affordable housing requirement to create more certainty. This is contradictory to the affordable housing requirements set out in the plan and will provide less certainty, again causing development to stagnate.

Page: [Policy H7 Affordable housing tenure](#)

Section: [N/A](#)

Policy H7 Affordable Housing Tenure

We support the clarity and the flexibility offered in the definition and proportions of affordable housing that should be delivered. Recognising that there may be specific and genuine needs for sites that do not meet these requirements, we would prefer this to be guidance that can be amended subject to a needs based assessment supported by the Borough on a scheme specific basis.

Page: [Policy H10 Redevelopment of existing housing and estate regeneration](#)

Section: [N/A](#)

Support -

Policy H10 Redevelopment of existing housing and estate regeneration

Estate regeneration is typically complex and in many instances is only viable with a long term view as the up-front costs associated with regeneration place huge pressures on peak debt requirements and cash-flow. This will require flexibility around tenure mix and affordable housing requirements across early phases with the ability to assess the completed regeneration as opposed to individual phases.

Regeneration is also typically delayed and blighted through long term leaseholders and other land ownership issues. The CPO and land assembly approach referred to in H1 will need to be more aggressively supported around regeneration schemes to help speed up the process and deliver more dense developments more quickly.

There are many wider social and economic benefits associated with regeneration and place-making and we strongly believe that these need to be given more value and should be considered more widely than purely a numbers game for affordable homes.

Page: [Policy H12 Housing size mix](#)

Section: [N/A](#)

Policy H12 Housing size mix

We welcome the flexibility offered in relation to unit sizes and the suggestion that 2 bedroom units can be considered as family units.

This policy seems to recognise the need for a pragmatic and flexible approach that reflects local markets and demand which is at odds with majority of the remainder of the plan which appears to want to be completely prescriptive and inflexible.

Policy H13 Build to rent

We fully support adoption of a policy for the build to rent sector. The approach to affordable housing as discounted market rent as set out in Policy H13 A is welcomed.

The approach to covenants set out in H13 B 2 needs careful consideration. There is an emergence of developers / contractors who are looking to develop out residential schemes for BtR with a pre-sale agreement to an investor or operator. In order to ensure that the plan does not stifle development and continues to maximise the opportunities for delivery at scale, the Mayor must ensure that there is clarity, flexibility and transferability of these covenants.

We welcome the approach to planning set out specifically in 4.13.1 and 4.13.2 and the wider Policy. We need to fully understand the implications of the Policy and whether these will be adopted as planning policy or guidance and what impact they will have on the built to rent sector. Generally the approach is supportive, however, the sector is still maturing and it will undoubtedly take some time for the developers and investors to fully appreciate the impact on their business models. Any feedback provided should be carefully considered if not to risk stalling the market.

Page: [Policy H15 Specialist older persons housing](#)

Section: [N/A](#)

Policy H15 Specialist older persons housing

The plan has rightly identified a need to increase this type of housing across London. The Policy classifications around C2 and C3 could be considered too prescriptive and if there is a genuine desire to increase delivery, then this should be left for developers to agree with the relevant planning authorities.

Applying the threshold approach to affordable housing will impact viability and if the slow development of this type of accommodation is to be increased a less onerous threshold should be applied for an interim period to promote development

Page: [Policy S1 Developing London's social infrastructure](#)

Section: [N/A](#)

Social infrastructure plays a critical role in the health and well being of communities in London.

We support the draft plans proposals for development that will provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies. Further guidance needs to be provided on how this policy will be applied when social infrastructure is included as part of complex mixed-use development schemes where there could be conflicting or competing policy objectives for other land uses.

We support the plan policies that encourage the best use of the public estate to provide social facilities. Spatial policies need to align with other public-sector initiatives designed to enhance service provision and create efficiencies, and the London Plan provides an opportunity to encourage this approach beyond that set out in the current draft. Complementary policies to support the redevelopment of sites that are intending to be vacated because receipts should be used to finance new social infrastructure should be considered.

Page: [Policy S1 Developing London's social infrastructure](#)

Section: [5.1.5](#)

We welcome the sequential approach outlined in draft Policy 5.1.5 regarding the loss of social infrastructure. This policy supports the re-use of land and assets for other forms of community provision before alternative land uses can be considered, recognising the importance of these uses to strong, stable and healthy communities.

Page: [Policy S1 Developing London's social infrastructure](#)

Section: [5.1.5](#)

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Page: [Policy S2 Health and social care facilities](#)

Section: [5.2.5](#)

The plan recognises a move to larger catchments for Primary Care in Policy 5.2.5. However, the implications of what this means for future provision through spatial strategy is not clear. The location of new facilities at points of high accessibility is one objective that should be encouraged.

Page: [Policy S3 Education and childcare facilities](#)

Section: [5.3.1](#)

In Policy 5.3.1, there needs to be some reference to the location of new education and training facilities at points of good accessibility.

Page: [Policy S3 Education and childcare facilities](#)

Section: [5.3.10](#)

5.3.10 and 5.3.11 are general statements that recognise the principle of good design and space standards in education provision. It is questionable whether this guidance should be included in strategic policy and may be better left for Boroughs to consider.

Childcare provision can often find it difficult to find suitable facilities and there is a long history of this land use taking space in buildings that were not designed for this purpose. There should be some recognition in the plan of the re-use of alternative facilities for childcare provision.

Page: [Policy S3 Education and childcare facilities](#)

Section: [5.3.10](#)

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Page: [Policy S3 Education and childcare facilities](#)

Section: [5.3.12](#)

With scarce urban land the recognition in Policy 5.3.12 for the need for shared education facilities is welcome. It is our view that the future for education in London needs to embrace a wider mix of land uses and recognise the need of technology in the way services are provided and the plan should be more ambitious and provide greater detail in its position on this point. A link to air quality policies and the way education sites are designed to contribute to the health and wellbeing of young people should also be considered.

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Page: [Policy E1 Offices](#)

Section: [N/A](#)

Policy E1. Offices.

Recommendations with respect to the development of smaller office units for SMEs etc should take into account the development of 'asset as a service' flexible workplace models. Our observation is that policy no longer needs to direct the physical provision of space for particular business sectors as the private sector has delivered a business model that can provide appropriate space flexibly. As part of Policy E1, the Mayor might consider whether a presumption for the reuse of commercial space as flexible space would be a better and more sustainable means of delivering workspace aimed at enterprizes outside of core areas.

Floorspace requirements. We note that floorspace requirements have been prepared on the basis of high levels of space utilisation and density compared to conventional office space. However, both densities and utilisation achieved via the 'asset as a service' flexible workplace model are much higher and will be achieved in both existing and new space. Accordingly, we would expect that office development requirements could be lower and that a wider range of occupancy should be used to model the potential impact of the wider adoption of asset as a service models of office occupancy.

Page: [Policy E2 Low-cost business space](#)

Section: [N/A](#)

Policy E2. Low cost offices.

In line with comments in connection with Policy E1, we suggest that alternative means might be available to provide low cost space to local business and that planning policy should only lock in existing uses where there is no prospect of alternative provision. In our view, the best means of supporting good growth in local markets whilst supporting established businesses is in encouraging a more diverse local property market based on alternative tenure models.

Page: [Policy E4 Land for industry, logistics and services to support London's economic function](#)

Section: [N/A](#)

Policy E4. Land for logistics etc

We would like to see the active consideration of the potential for the growth and transformation of 'last mile' logistics in the Mayor's Plan. It can be anticipated that last mile logistics will be subject to continuing and sustained disruption and innovation. Furthermore, last mile logistics will be significantly affected by Healthy Streets initiatives introduced as part of the Mayor's Transport Plan. Our recommendation is that The Plan should make provision for alternative distribution locations – potentially as part of higher density, mixed use development – providing flexibility for changes in business models that can be anticipated as different delivery models are adopted by logistics companies – e.g. drones and AVs.

Page: [Policy E8 Sector growth opportunities and clusters](#)

Section: [N/A](#)

Policy E8 – Sector Growth Opportunities

We support the intent of this section and would like to see a more explicit link to Industrial Strategy – for example by reference to the Grand Challenges outlined in the recent Industrial Strategy White Paper.

Page: [Policy E9 Retail, markets and hot food takeaways](#)

Section: [N/A](#)

Policy E9 and Policy E10

These planning policies include elements of micro-management of delivery (location of food outlets, disabled provision in hotels) which give the impression of being beyond the scope of a strategic planning document. The Mayor might wish to consider whether these planning aims can be met by other means.

Page: [Policy T1 Strategic approach to transport](#)

Section: [N/A](#)

We support the headline strategic approach to deliver the Mayor's strategic target of 80% of all trips in London to be made on foot, cycle or public transport by 2041 (Policy T1), and to achieve this by reducing Londoners' dependency on cars to enable sustainable growth. We feel that providing customers with flexibility and choice of multi-modal transport options, in line with the principles of Mobility as a Service (MaaS), will be fundamental to achieving these strategic aims. We note that in the lifetime of this plan, public transport is likely to include newer modes of shared transport which may include fleets of fixed route/on demand electric, automated vehicles designed to carry multiple occupants, whether operated by public or private licenced operators.

Page: [Policy T2 Healthy streets](#)

Section: [N/A](#)

We support the Healthy Streets approach (Policy T2) to ensure community coherence, social awareness, enhancing the public realm and improving accessibility and opportunities for all; improving health through active travel and reduced pollution.

We note the need to ensure that the shift to cycling, walking and Public Transport accommodates the needs of the entire range of mobility user needs and welcome the commitments to specific infrastructure projects including but not limited to the commitment to provide wheelchair accessible bus stops (2017 – 2020) and disabled parking at new residential developments as well as destinations (T6.5).

Page: [Policy T3 Transport capacity, connectivity and safeguarding](#)

Section: [N/A](#)

We recognise the essential nature of the new station developments (Policy T3: 10.3.2) and welcome the opportunities and growth potential that they can deliver for London and local communities. We note the importance of ensuring that streetscape and onward journey option improvements are implemented to address significant planned increases in pedestrian demand created by these enhanced hubs, and the need to balance the needs of the local community and travelling public to ensure the hub locations fulfil the needs of the aspects of social, sustainable and environmental agendas

Page: [Policy T4 Assessing and mitigating transport impacts](#)

Section: [N/A](#)

We note that T4 D states that planning permission may depend on provision of necessary Public Transport / active transport infrastructure to cope with additional demand and ask whether one acceptable option might be for developers to make a commitment to provide and fund the creation, operation and maintenance of new privately operated public transport services (subject to licence) to satisfy this forecast demand and meet planning requirements?

Page: [Policy T6 Car parking](#)

Section: [N/A](#)

We welcome the commitment to ensure provision of ULEV charging infrastructure as a vital enabler to achieve London's ambition which is set in the context of the UK Government's stated objective to achieve a fully de-carbonised new car and van fleet by 2040 and for almost all cars and vans on UK roads to be zero emission by 2050.

We note that 10.6.8 states that in order to meet the Mayor's target for carbon-free travel by 2050, all operational parking must provide infrastructure for electric or other Ultra-Low Emission vehicles. We ask whether a set of interim targets designed to enable progression towards this 2050 outcome would assist to ensure progress remains on target to achieve the 2050 position?

We welcome the commitment to provision of 20% active charging for residential (Policy T6.1) – should the London Plan provide further encouragement by increasing the level of ambition beyond 20%, with similar targets set for Workplace Charging infrastructure (Policy T6.2) and Freight (Policy T7)?

We suggest that consideration is given to strategically located rapid charging hubs which may enable efficient use of limited urban space in certain locations and provide attractive business models for potential investors compared to alternatives. Could the London Plan encourage the growth of EV Charging Stations or Hubs with Rapid (50kW) or High Power (150kW+) as effective solutions for Londoners who do not have access to off-street parking?

We note the critical importance of supporting (non-transport) infrastructure in enabling the policy outcomes to be realised. One of which is the essential requirement for a resilient power distribution network of sufficient scale to meet the demands placed on it to enable the growth in EV vehicles (and achieve the 2050 target). The other is the need for data communications networks with sufficient bandwidth, resilience and latency performance to support anticipated growth in V2V, V2I, V2X.

Page: [Policy DF1 Delivery of the Plan and Planning Obligations](#)

Section: [N/A](#)

Chapter 11. Funding the Plan.

Policy DF1. Delivery of the Plan and Planning Obligations

The Mayor's intention to provide greater clarity with respect to planning obligations is a necessary step to align the creation of value through development with good growth principles. Viability tests will remain an important element of the planning process, particularly where development is not based on a conventional for sale model and where the capitalisation of income streams may not deliver a positive land value once planning obligations are taken into account. The mayor should also take into account when implementing proposals under this policy that London is increasingly the focus of globally-sponsored development. Ensuring that all investors into London development are fully appraised of development obligations will be important to ensure that the development market remains liquid. Our experience of working with overseas developers is that they do not necessarily fully appreciate the complex range of obligations associated with development in London, which results in an imperfect land market. If GLA pursues a prescriptive planning obligation model, then it must ensure that all stakeholders – current and future are able to assess the impact of all obligations at the point of land acquisition.

Fiscal devolution. Arcadis supports the principle of greater fiscal devolution so that greater decision making in connection with investment can be devolved to local bodies. However, we also support the redistributive elements of local taxation which ensure that growth from large, successful cities such as London is used to support other areas with a shallow local tax base. We recognise that use of some of London's tax surplus to fund the London investment gap highlighted in the Mayor's Plan will consume resources that currently contribute to other elements of national or regional investment funded from public sources. Accordingly, any proposals for regional fiscal devolution can only be considered as part of a national policy rather than a London-specific concession.

Land Value Capture. LVC may have a role in closing the funding gap, albeit we recognise that the planning obligation model proposed by the London Mayor will capture a greater proportion of development value for site specific public investment rather than London-wide infrastructure. Whilst we do not expect to see full details of all options available to the London Mayor, we suggest that the Plan should be used to prompt a wider debate by featuring a wider range of LVC options than the single reference to a Development Rights Auction model. In our view, without a more extensive section on LVC, the chapter on funding is weighted too much in favour of the requirement for local fiscal devolution.

Schools

£11 billion new to 2050

£12 billion r&m to 2050

Health

mainly supported by CiL, together with in-kind contributions (land, space etc)

£6.9bn programme to 20/21 including 4.8 on existing and 2.1 on growth and transformation

Single estate thinking

Utilities

eENERGY - £148 bn by 2050

Water - £46bn by 2050

Heat networks are excluded - not a regulated undertaking and therefore not fundable like a utility

Digital - £8bn

Green infrastructure

New value models - natural capital accounting

Still need for new funding streams

Waste and Circular - potential £7bn benefits by 2036 based on operational circular model

Cultural - rapid rate of loss, so investment needed - more from CIL, S106 etc?