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Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
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02 March 2018

Dear Mr Khan,

DRAFT NEW LONDON PLAN

Please find enclosed representations on the Draft New London Plan, on behalf of British Land.

We trust that our representations will be fully considered and taken into account as the preparation of the New London Plan continues. If you require any clarification on any matters raised in these representations, or wish to discuss further, please do not hesitate to contact me.

Yours sincerely,



Michael Meadows
Planning Director



MAYOR OF LONDON DRAFT NEW LONDON PLAN

REPRESENTATIONS BY BRITISH LAND

1. British Land Company Plc (British Land) is pleased to formally submit representations on the Draft New London Plan.
2. British Land is committed to London. We own, manage develop and invest in major mixed use, commercial and residential developments in London, most notably at Broadgate in the City of London, Paddington Central in Westminster, Regent's Place in Camden, Eden Walk in Kingston, Aldgate Place, Blossom Street and Bromley-by-Bow in Tower Hamlets, Ealing Broadway in Ealing and Canada Water in Southwark. We have also recently purchased a significant interest in Woolwich in the Royal Borough of Greenwich. In total, we have £10.1bn of assets under management across London (£7.9bn of which we own). This includes 6.6 million sq ft of offices and 2.6 million sq ft of retail floorspace, with a significant committed and potential development pipeline of additional office, retail, leisure and residential accommodation. A map of our London assets is attached.
3. It is within this context that we welcome the opportunity to make representations to the draft New London Plan and set out our response to the draft policies contained in the Plan.
4. As a general note, we fully support the Mayor's strategic vision to prioritise the development of Opportunity areas; brownfield land; and sites which are well-connected by public transport whilst proactively promoting higher density development in suitable locations. We further support the Mayor's ambitious approach to facilitating and delivering "good growth" and "healthy streets". The Mayor's continued and strengthened protection of offices and other CAZ strategic functions within the CAZ is also welcomed.
5. Whilst the overarching aims of the Plan are positive, we note that the Plan places a number of new and substantial obligations on developers, which need to be reviewed and considered in the round. Cumulatively, these policies and obligations will have a significant impact on development viability and will risk project deliverability, thereby potentially jeopardising the Mayor's strategic objective for growth. When combined, the threshold approach to delivering affordable housing under Policy H6, the urban greening targets introduced by Policy G5, the requirement for affordable workspace and affordable retail under Policies E3 and E9, the carbon offset payments required under Policy S12, the increased cycle parking provision required under Policy T5, amongst others, will have a notable and significant impact on development viability. These obligations, when considered alongside MCIL2, S106 obligations and other development costs, have the potential to severely impact on the delivery of schemes, which could disincentivise developers from investing in London and undermine the aspirations of the draft London Plan. We therefore urge the Mayor to review the obligations placed on developers and consider their impact cumulatively through strategic viability review.
6. The London Plan Viability Study Technical Report (December 2017) states that the associated costs of these additional policies have been tested, however this is not clear in the analysis and needs further explanation and testing with more appropriate case study examples, including those of strategically important sites of 2,500 residential units and above. The examples used within the viability testing are not of sufficient strategic scale to properly assess the draft London Plan requirements alongside the significant infrastructure costs associated with bringing forward large development sites.

Opportunity Areas (Policy SD1)

7. We welcome the wording of Policy SD1 (Opportunity Areas) which supports the growth potential of Opportunity Areas and identifies them as the principal locations for high density development and important drivers for the aspirational delivery targets set within the draft London Plan.
8. With specific regard to Canada Water, we support the classification of Canada Water as an Opportunity Area which is “ready to grow” and which has the potential to support 5,000 new homes and 20,000 new jobs. The Canada Water Masterplan seeks to deliver approximately 3,500 new homes and support approximately 20,000 new jobs, in line with the strategic objectives of Policy SD1.
9. In relation to Regents Place, we feel there is considerable capacity for additional growth in employment floorspace with a view to increased densities. Indeed, Regents Place has defined its own density in line with this policy. Furthermore, we would welcome the extension of the Euston Opportunity Area to incorporate the entirety of Regents Place to the west (up to Osnaburgh Street).
10. British Land is also pleased to see the recognition of the Knowledge Quarter within the supporting text (para. 2.1.66). The Knowledge Quarter is an increasingly important and influential cluster of organisations for whom the availability of the right type of space in the right locations is crucial to furthering the success of the Life Sciences and associated industries.
11. The identification of capacity for 13,000 jobs and 1,000 homes in the Paddington Opportunity Area is strongly supported, in particular recognition that Paddington has the potential to provide a substantial amount of employment generating floorspace, as one of the few remaining locations suitable for large-scale office developments in the West End.
12. Similarly we support the identification of Woolwich as an Opportunity Area, which has the potential to provide 5,000 new homes and 2,500 new jobs, capitalising on the opening of Crossrail later this year.

The Central Activities Zone (Policy SD4)

13. Liverpool Street is identified in the dLP as a ‘CAZ retail cluster’. These are defined as, ‘significant mixed use mixed-use clusters with a predominant retail function and in terms of scale broadly comparable to Major or District centres in the London Plan town centre network.’
14. The Liverpool Street retail cluster is identified for ‘High Growth’ meaning it is likely to experience strategically significant levels of growth with strong demand and/or large-scale retail, leisure or office development in the pipeline and with existing or potential public transport capacity to accommodate it (typically PTAL 5-6). This provides a positive supporting policy context for increasing floorspace at Broadgate as a whole and is welcomed.
15. Policy SD4 identifies that the vitality and viability of CAZ retail clusters should be supported. This is positive in the context of proposals to increase retail and active frontages across British Land’s London campuses.

Offices, other strategic functions and residential development in the CAZ (Policy SD5)

16. We welcome the additional support and the primacy given to office floorspace relative to residential floorspace in core commercial areas of the CAZ and most CAZ Opportunity Areas. The effect of mixed use policies, for example in the London Borough of Camden and City of Westminster, which require an equivalent level of residential floorspace to be provided alongside any uplift in commercial floorspace either within the building or elsewhere, can make

redevelopment challenging when office buildings comes to the end of their operational life or when tenant / occupier leases expire and will reduce the supply of employment floorspace.

Town Centres (Policy SD6)

17. British Land welcome Policy SD6 which supports town centres as locations for mixed-use or housing-led intensification and higher density renewal. Also welcomed is the reference to the particular suitability of town centres for smaller households, Build to Rent, older people's housing and student accommodation.
18. The Canada Water Masterplan seeks to deliver a variety of housing choice by providing a range of housing types, tenures, price points and sizes which could potentially include Build to Rent, assisted living and student accommodation.
19. Policy SD6 looks to align town centre policies with national (and local) policy meaning that the 'scale' test would no longer exist. The London Plan also reiterates the requirement for town centres to have clearly defined boundaries. These changes are welcomed to ensure a consistent approach across the different tiers of planning policy.
20. The policy identifies that Development Plans should identify centres that have particular scope to accommodate new commercial development and higher density housing, having regard to the growth potential indicators referred to above. Criteria to consider in assessing the potential for intensification include:
 - demand assessments for retail, office and other uses;
 - public transport accessibility/capacity; and
 - planned or potential transport improvements.
21. Liverpool Street and Broadgate are well positioned in relation to the above criteria to support higher density commercial and retail development in line with the 'High Growth' classification.
22. Woolwich is identified as having capacity to deliver 5,000 new homes and 2,500 new jobs. We therefore fully support the Plan's proposals to reclassify Woolwich Town Centre in the future as a Metropolitan town centre to help fulfil this growth potential.

Housing Supply, Density and Mix (Policies H1, H12, D6 and D14)

23. We support Policy H1 and in particular parts 2(a) – (c) which direct housing delivery to sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m of a Tube station, rail station or town centre boundary as well as the mixed-use redevelopment of car parks and low-density retail parks and housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses.
24. We also generally support Policy D6 which seeks to optimise density, however, we question the purpose and intent in requiring the submission of a Management Plan for developments over a certain density. Supporting paragraph 3.6.8 requires management plans to include details of day-to-day servicing and deliveries, and longer-term maintenance implications including the affordability of running costs and service charges (by different types of occupiers). It also requires costed plans to set out how management arrangements will work in mixed-tenure schemes and the way in which residents' views will be taken into account in delivering affordable services. In our view, the long-term maintenance of residential properties should not be controlled by the planning system and should instead have the ability to respond to changing resident needs and demands. Further, service charges and running costs are highly likely to change over time and we therefore question the usefulness of this exercise and its relevance to ensuring high quality living environments for higher density schemes. These are commercial and free market matters for property owners and not strategic matters meriting GLA attention.

25. We support the aims of Policy H12 and in particular welcome part A (6) which notes that a proportion of one and two beds are generally more appropriate in more central or urban locations, and part C which states that boroughs should not set prescriptive dwelling size mix requirements (in terms of number of bedrooms) for market and intermediate homes.
26. Policy D14 – Sunlight and Daylight states that new development should avoid causing unacceptable harm to the amenity of surrounding land and buildings, particularly in relation to privacy and overshadowing and where tall buildings are proposed.
27. The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential, mixed use and/or commercial typologies within London. Decision makers should recognise that fully optimising housing or commercial potential on large sites may necessitate standards which depart from those presently experienced or set out in the BRE Guidance and that in adopting more appropriate daylight and sunlight standards it is still possible to achieve a satisfactory provision of amenities and avoid unacceptable harm.
28. As has been shown in the recent Appeal Case for the Whitechapel Estate (Appeal Reference: APP/E900/W/17/3171437) an appropriate degree of flexibility should be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves, especially in urban areas, opportunity areas, large sites in accessible locations and town centres. This is critical if the aspirations of the draft London Plan are to be achieved.

Specialist Older Persons Housing (Policy H15)

29. Part C of Policy H15 states that “Sheltered accommodation and extra care accommodation is considered as being in Use Class C3. Residential nursing care accommodation (including end of life/ hospice care and dementia care home accommodation) is considered as being in Use Class C2”. Firstly, we do not consider it appropriate for a policy document to define particular use classes, as this a matter for legislation, not policy. Secondly, given that there is no definitive means by which to establish the use class of specialist elderly and extra care housing, this should be determined on a case-by-case basis. Defining extra care accommodation as Use Class C3 has significant financial implications, which will discourage developers and operators from providing this type of much-needed accommodation. We therefore suggest that the definition is removed from Policy H15 and the use class is determined on an individual basis as provided in law.

Workspace (Policies E1, E2 and E3)

30. British Land’s London portfolio incorporates over 6.6 million sq ft of office floorspace in primary, secondary and tertiary locations. We support the general increased protection for, and encouragement of, office space in Policy E1. Linked to this, we welcome the further support for offices contained within Policy SD5, noting that offices are to be given greater weight relative to new residential in the CAZ. This is particularly relevant in areas where mixed-use policies (those requiring an element of residential floorspace alongside new office floorspace) can curtail office development due to the requirement to incorporate residential floorspace within an existing office building or source alternative residential land. Part G of Policy E1 relates to lower cost and affordable workspace and we set our thoughts out on the merits of these policies below.
31. Policy E2 is of most concern. The life cycle of office space generally results in degradation of the quality and value of floorspace to the point at which refurbishment or redevelopment becomes a viable and desirable option. The churn in the market of office space at the various price points and quality is dynamic and constantly changing, as new buildings come forward and older buildings are not able to demand market rents. This is a cycle that satisfies a very broad range of occupiers and there is no suggestion that there are any underlying structural

issues with the way the market operates. However, by defining a level of lower cost and quality and seeking to protect buildings at a certain point in the cycle that satisfy this quality (and to a lesser extent the tenant) there is a real danger of unbalancing the cycle. This could lead to some buildings being unable to come forward for redevelopment due to a level of policy protection or buildings not becoming available at lower prices points because of a concern over future policy protection. In either case, the unintended consequence would be to stymie the flow of different office floorspace that satisfy different elements of the market and to see certain office rents rise to enable sub market office space to be subsidized.

32. The support for flexible workspace in Policy E2 is to be encouraged but that this could be accommodated within Policy E1. To some extent this is already the case at Policy E1 Part A. Furthermore, other types of office provision are also fulfilling this part of the market. In 2017, British Land launched Storey, a flexible workspace product aimed specifically at SME's. This product is a simple, all-in-one rental model that allows the use of small spaces, available on short leases, with shared services, higher levels of fit-out and lower up-front costs, which make it ideal for start-up and smaller firms. This product and similar ones in the market have an important and increasingly influential role in the provision of workspace for SMEs and as such additional obligations are not required by policy.
33. With regard to Policy E3, British Land recognises and supports the provision of affordable workspace. Indeed, British Land's 1 Triton Square scheme includes the provision of affordable workspace which we believe will add to the diversity and richness of the area as a whole and support local employment and training. However, there is a concern that this policy may be applied as a blanket-approach by Boroughs. It will not be appropriate for all office developments to provide some form of affordable workspace, for example where it would not create the critical mass to be successful or distort the local market.. Furthermore, there are concerns over the protection afforded to occupiers rather than land uses and the emphasis placed on operators of such space. The definition of affordable does not reflect the full range of costs faced by occupiers.
34. Our experience suggests that market rent on a short-term flexible lease with higher specification fit-outs and shared services can be more attractive and affordable than subsidised rents on more traditional leases. We would suggest that the onus be on Local Planning Authorities to demonstrate the need through the Local Plan evidence base process to set local criteria for affordable workspace to ensure a robust application of the policy.

Affordable Retail (Policy E9)

35. Comments in relation to affordable workspace should be equally applied to affordable retail. British Land are one of the UK's largest retail landlords with over 18m sq ft under management and 2.6m sq ft in London alone. We are therefore best placed to comment on the state of the retail market and emerging trends. The retail market is experiencing significant challenges with increased competition from online retailing and the demise of the traditional High Street. Additional burdens placed on retail development through the application of Policy E9 (affordable and small retail provision) needs to be carefully considered. Similar issues exist here as with office floorspace, namely, the definition of affordability, eligibility and operation of subsidies and the practical difficulties experienced in limiting the size of units at a very early stage. British Land already employ a range of measures to help facilitate independent and small-scale new and existing retail tenants to trade including turnover based rents, mentoring and start-up / fit-out cost assistance. Such a policy could result in inflated Zone A rents in order to subsidise the additional financial burden of affordable retail provision.

Urban Greening (Policy G5)

36. Policy G5 introduces a formula based system for identifying an appropriate amount of 'urban greening' required in new developments. This is based on site area vs type of coverage (permeable vs impermeable etc). Urban Greening is identified as including a wide range of options including, but not limited to street trees, green roofs, green walls and rain gardens.

37. British Land supports the principle of sustainable development and over the past 30 years has actively pioneered and delivered some of the most sustainable and ecologically positive schemes in London which have resulted in numerous industry awards. However, British Land holds significant reservations on this policy as currently drafted. An Urban Greening Factor (UGF) of 0.4 for residential developments and 0.3 for commercial developments may be achievable in suburban locations but will not be feasible in higher density developments or opportunity areas given the scale of delivery envisaged by the draft London Plan. A figure of 0.2 for all development would be a more appropriate figure and would be more onerous than BREEAM Excellent.
38. There is no suggestion of what will happen should the formula target be missed but it may be expected boroughs could treat this like the carbon offsetting targets and seek contributions in the absence of sufficient greening. This could have result in a further and significant financial burden on development and add to the challenges of scheme viability. The unintended consequence of applying this extra cost on development will be for less development to proceed, and if it forces rent levels to rise that will make London less competitive in a global market place at a time when London is keen to promote itself as being 'open for business' in a changing and increasingly competitive world.

Improving Air Quality (Policy SI1)

39. Policy SI1 seeks to improve air quality, a principle which fully accords with British Land's corporate objectives. British Land is however concerned with the Air Quality Positive target for larger regeneration and EIA developments. This is not something that is defined in the draft London Plan and is likely to be difficult to achieve where, for example, significantly higher density development is proposed, in accordance with other strategic policies. Greater clarity is required and the viability implications of the policy need to be fully tested before it can be supported.

Minimising Greenhouse Gas Emissions (Policy SI2)

40. British Land is a market leader on sustainable design, construction and operation of buildings within the property industry and supports the goal to minimise carbon emissions. The principle of Policy SI2 is therefore welcomed, however as currently drafted it raises numerous concerns on deliverability and the potential impact on other draft London Plan aspirations.
41. Policy SI2 seeks 'zero carbon' without defining what that involves. As acknowledged in the AECOM Evidence Base, it is not possible to achieve zero carbon across all developments, as such the policy allows for a carbon off-set payment to be made. This will have a significant impact on development viability which has not been properly tested.
42. We have run some indicative calculations on three office schemes based on broad assumptions for how buildings will perform to give a reasonable picture of the scale of policy impact. Whilst design changes may be possible to reduce the overall off-set payment, they will not necessarily reduce the overall cost.

SI2 Example Calculations:

	Example office A (based on BRUKL)	Example office B (based on BRUKL)	Smaller version of B (based on BRUKL)
m2 GIA	34,002	49,239	30,000
Operational Carbon Emissions			
BER kgco2/m2	18.8	20.8	20.8
TER	21.7	25.1	25.1
gap to zero - annual kg co2/m2 to offset	18.8	20.8	20.8
kg co2/m2 * building area	639,247	1,024,163	624,000
tonnes co2	639	1,024	624
tonnes co2 *30 years	19,177	30,725	18,720
offset cost at £60/tonne	£1,150,645	£1,843,493	£1,123,200
offset cost at £90/tonne	£1,821,854	£2,918,864	£1,778,400
Construction Carbon Emissions			
	<i>from design team</i>	<i>from BL Benchmark</i>	<i>from BL Benchmark</i>
kgs co2 / m2 manufacture		856	865
kgs co2 total	39,000,000	42,148,233	25,950,000
tonnes of carbon	39,000	42,148	25,950
offset cost at £60/tonne	£2,340,000	£2,528,894	£1,557,000
offset cost at £90/tonne	£3,510,000	£3,793,341	£2,335,500
Total cost at £90/tonne	£5,331,854	£6,712,205	£4,113,900

43. On a relatively small office building of 30,000 sqm, the new policy could result in a payment of circa £1.8m and if construction carbon emissions are included this could rise to circa £5.3m. This would have a significant impact on viability.
44. Initial analysis of the Canada Water Masterplan indicates a payment of between £19.5m and £95m would be required which would stall the development of 3,500 homes or significantly impact on affordable housing delivery should the policy be adopted in its current form.
45. Given the above, British Land considers the draft London Plan should adopt internationally recognised standards for the definition of zero carbon which allow flexibility in how zero carbon could be achieved and has worked with industry bodies (such as the UK Green Building Council) to put forward the following suggested policy wording:

A. Major development should be zero-carbon in operation. This means that all the energy consumed by the building, as predicted at the point of completion, shall either supplied by zero carbon sources (such as renewable power, clean electricity or gas) or offset using a transparent and auditable methodology.

B. A minimum on-site reduction of at least 35 per cent beyond Building Regulation is expected. Residential development should aim to achieve 10 per cent, and non-residential development should aim to achieve 15 per cent through energy efficiency measures in building fabric where possible.

C. Where it is demonstrated that the zero-carbon target cannot be fully achieved on-site, any carbon emissions shortfall should be addressed through the following options:

- *a cash in lieu contribution to the relevant borough's carbon offset fund, and/or*
- *off-site investment in the London area, provided that an alternative proposal is identified, and delivery is certain and/or*
- *purchase of third party verified carbon offsets which fund energy or carbon projects in London and/or*
- *commitment to purchase green power or green gas contracts for a 30-year duration post completion.*
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D. Reducing carbon dioxide emissions, and minimising both annual and peak energy demand, should be in accordance with the following energy hierarchy:

- 1. Be lean: use less energy and manage demand during construction and operation.*
- 2. Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly. Development in Heat Network Priority Areas should follow the heating hierarchy in Policy SI3 Energy infrastructure.*
- 3. Be green: generate, store and use renewable energy on-site.*

E. Major development should include an energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy and any proposed offsetting will be undertaken. The strategy should also include steps the development will take to reduce embodied carbon emissions.

Transport (Policy T1)

46. We support the Mayor's strategic approach to transport and the continued emphasis on an integrated approach. Further, we support the Mayor's vision to achieve 80% of trips in London being made by foot, cycle and public transport by 2041 and the key objectives of better interchange, safer street environments and better-quality public transport as set out under Policy T1.
47. As a major developer in London we acknowledge our role in supporting the Mayor in responding to these challenges and have a proven track record of supporting TfL in delivering their transport aspirations for London.
48. British Land is active in working with GLA / TfL in a number of areas, for example:
 - to support its plans for a range of Strategic and site specific projects eg: Rotherhithe Cycle Bridge, Bakerloo Line Extension, Crossrail 1 and Crossrail 2;
 - as a partner in the TfL Property Partnership Framework;
 - in helping the GLA/TfL prepare its London Housing Infrastructure Bid;

- in attending the MTS/DRAM working groups;
- in assisting TfL in lobbying Central Government for funding towards major London-wide transport infrastructure;
- in partnering to deliver transport improvements eg: Euston Circus; and
- British Land is also keen to help TfL innovate and pioneer ways to deliver transport improvements associated with our holdings across London.

49. It is in this context that we make comments on some specific aspects of the transport policies.

Healthy Streets (Policy T2)

50. We support the Mayor's proposals to promote walking and cycling through the Healthy Streets approach. We are encouraged by the commitment that the Mayor will work to plan at a strategic network level to ensure better, safer and more effective transport operations across the capital.
51. Health, wellbeing and active lifestyles are key principles for place-making across our property holdings and campuses, with a vision for the vast majority of trips to be made by foot, cycle and public transport. Improved permeability and connectivity for pedestrians and cyclists is a key strand in supporting a shift towards greater use of sustainable modes and forms an important principle within our aspirations for Canada Water, alongside support for improved public transport services. We have already engaged with the Healthy Streets team at TfL on our proposals for Canada Water and will continue to do so as we bring development forward.

Transport capacity, connectivity and safeguarding (Policy T3)

52. We acknowledge the need for the Mayor, TfL and local authorities to plan for transport policies and projects that support growth and enable greater effectiveness in the active and public transport networks.
53. Our plans for Canada Water include the provision of, or support for, better walking and cycling connections, additional bus services and better access to Surrey Quays station, which in turn will help to dissipate passenger demand between that and Canada Water stations.
54. We expect to work with TfL to deliver the necessary transport infrastructure enhancements in the wider area. As part of the wider agenda for this and other Opportunity Areas in London, we would also expect TfL to be actively delivering network improvements and allocating sufficient funds in its Business Plan to unlock Opportunity Areas and regeneration projects. These TfL delivered projects would help address existing and forecast issues of background growth, congestion and crowding, and provide the wider infrastructure necessary to enable development on the scale envisaged in the current and draft New London Plan.

Assessing and mitigating transport impacts (Policy T4)

55. We support the ongoing emphasis on the mitigation of transport impacts arising from new development. We believe that delivering 'good growth' on the scale envisaged requires a collaborative approach between developers, TfL, the GLA and local authorities. It is important that the strategic transport infrastructure framework to enable development to take place in Opportunity Areas is determined at an early stage, as this provides developers with a clearer understanding of what is required for each Opportunity Area and thus the context within which individual development proposals can be brought forward.
56. We duly recognise our role in contributing to transport and infrastructure improvement which address the impacts of a development and have contributed many tens of millions of pounds to support TfL projects through our development programme over the past 20 years. As such, we understand that in certain circumstances, it can be appropriate for a development to help

facilitate a wider transport infrastructure scheme, whether through the provision and/or safeguarding of land, the delivery of relevant physical improvements or financial support through planning obligations where such support can be reasonably related to the impacts of the development. However, it is also important that developers are not seen as a funding or delivery source for strategic transport upgrades that are needed to deliver the wider growth agenda at a London-wide level. It is therefore essential that the Mayor, through TfL and other agencies, continues to plan for the funding and delivery of strategic transport schemes to unlock Opportunity Areas, including Canada Water. This should include developing a broad range of potential funding sources, for example mechanisms which allow business rates redistribution to London Boroughs to be prioritised towards Opportunity Areas, recognising that development in these Opportunity Areas will in turn generate substantial uplift in business rates.

57. We would welcome the opportunity to discuss how the planning system and financial regulations currently operating in London be changed to guarantee that more of money received by local councils and the GLA from regeneration projects is ring fenced for the area in which they were generated for example Business rates, Council tax, new homes bonus. This seems reasonable to us and will help local communities get behind and fully benefit from the regeneration projects occurring in their areas.

Cycling (Policy T5)

58. At a London-wide level we support a greater emphasis on cycling infrastructure and other measures which will encourage more people to travel in this way, particularly for shorter journeys.
59. It is nevertheless important that new cycle routes do not adversely affect other network users. In particular, where segregated cycle routes are proposed along or across key sections of the road network resulting in a reallocation of highway space, any loss of highway capacity for non-cyclists should not adversely affect bus journey times along key corridors. To do so would undermine the principle of encouraging greater bus use as Opportunity Areas are developed and could also impact on TfL's own revenue stream and future bus network development opportunities. A balance therefore needs to be found. Equally, where cycle segregation passes through areas of high pedestrian activity, pedestrians should not be disadvantaged by having to walk further or wait longer to cross roads to reach their destination.
60. We are committed to providing adequate cycle parking within all of our developments, both as private spaces for residents and occupiers and as provision in the public realm or elsewhere for visitors and customers. We are planning for this provision in our proposals at Canada Water and are also willing to provide space for new cycle hire docking stations at Canada Water, anticipating that TfL will bring forward an extension of the Santander cycle hire scheme into the Rotherhithe area in the near future.
61. The draft New London Plan seeks to increase the provision of cycle parking for many land use classes. We note that the proposed cycle parking standards for class C3/C4 dwellings could result in the provision of almost one cycle parking space for every resident. While we understand that the availability of cycle parking underpins the potential for cycle use to increase, we are not convinced that cycling will increase to the extent that almost every resident will either own or use a bicycle, given that despite the potential to use adapted cycles some residents with disabilities, together with some of the very young or elderly population, may be unable to use cycles.
62. While we have no in-principle objection to the provision of adequate levels of cycle parking, we believe that site-specific consideration will need to be given to some development proposals, particularly where building footprints (retail, office and leisure) are constrained and/or a range of access needs are present. We would therefore welcome a review of the cycle parking standards being put forward in the draft New London Plan, so that due consideration is given to the type of occupier (particularly in the case of residential development) and the way in

which cycle parking is delivered (for example within common areas, distributed into separate tenant areas, or available in the public realm) recognising the implications for land take and scheme viability.

63. Specific to Canada Water, we are concerned that the design of the Cycle Superhighway 4 along Jamaica Road will significantly increase bus journey times to the detriment of existing bus users in the Rotherhithe and Canada Water area and also in unlocking the bus patronage of the Canada Water opportunity area. We would welcome the opportunity to review this further with TfL and Southwark Council.

Car parking (Policy T6)

64. We acknowledge and support the principle of reducing car use across London over time as a means of underpinning improvements in health and air quality and the rebalancing of highway space to provide better facilities for pedestrians, cyclists and bus users. Further, we recognise that in central London locations, and others with very good public transport accessibility, it may be appropriate to consider setting lower maximum car parking standards.
65. However, we are concerned that the draft New London Plan takes a very stringent approach in its new car parking standards for development in high PTAL areas when associated with town centre redevelopment. We would not wish to see town centres fail as a result of the approach taken to car parking in the draft New London Plan, nor at those developments for which we are responsible.
66. We are extremely concerned that an instant ban on any car parking for new development in high PTAL areas will make it harder to let space and result in regeneration stalling or certain land uses not being promoted in schemes at all.
67. Whilst we recognise that supply will influence demand to some extent, an immediate move from current London Plan parking standards to a broad 'no parking' policy in many locations outside the central area does not reflect the way in which car use is evolving, with increased ownership of electric vehicles, nor is it supported by the necessary commitments by TfL to improved public transport services, which themselves will take longer to implement due to funding pressures within TfL.
68. The transition to very low levels of car use across London will be gradual, influenced not only by supply and demand but also by wider influences including changes in technology, vehicle power sources and demographics. It is unlikely that this will happen very rapidly, even with stringent parking standards, and the approach taken in the draft New London Plan could have adverse effects on the Mayor's growth agenda by making development in town centres and such accessible areas unattractive in the short to medium term.
69. For Canada Water in particular where a new Major Town Centre and High Street is proposed, this policy raises particular concerns. A significant amount of new retail and leisure floorspace is planned and as currently drafted, the policy would be detrimental to the vitality and viability of the centre and reduce its competitiveness against other centres, as the lack of parking will be a barrier to attracting retail and leisure operators to invest in new town centre development given how challenging they expect retail economics to be over the short to medium term.
70. The GLA should be doing everything within its powers to support retailers and high streets which are struggling across London. The GLA/TfL stance on parking is therefore extremely unhelpful in this context.
71. As one of the largest retail landlords in the UK, we have tested this with a range of major retailers and leisure operators who we would consider to anchor the new town centre at Canada Water. We would be happy to work with you to convene a discussion with these organisations so that they can explain how they plan their business decisions when considering whether to locate in untried locations or new developments.

72. The draft New London Plan does not appear to consider the implications of a zero parking policy in terms of the potential consequences of 'overspill' parking affecting local roads and communities, given that the change in travel behaviour over time will mean that car use will fall gradually rather than immediately.

Residential parking (Policy T6.1)

73. In relation to residential parking, there is a lack of clarity in the draft New London Plan regarding how parking provision for disabled users is to be provided in central and high PTAL areas. Policy 6.1 says that disabled persons' parking should be provided for in new developments, up to a potential level of 10% of the number of dwellings; however, the maximum residential parking standards indicate that development in these areas should be car-free. It is therefore unclear which of these approaches should take precedence. Our view is that policy should clearly allow for some disabled persons' parking in all residential developments to ensure that "disabled people have a genuine choice of housing within a local environment that meets their needs" (para 10.6.9).
74. The provision of residential parking should also consider existing car ownership levels in the area in which development is located. Car ownership is distinct from car usage (the ownership of a car does not necessarily imply that the car is used for all trips), and while parking standards can rightly seek to reduce car ownership over time, we believe that the draft New London Plan should reflect a more staged approach to reducing car parking across London (even in high PTAL areas), allowing it to both influence and respond to changing travel patterns and behaviour over time.

Retail parking (Policy T6.3)

75. The draft New London Plan proposes that retail development (at any scale) in central London and areas of PTAL 5-6 should be car-free. We support the principle of reducing car use and encouraging shoppers to travel by other means, supporting the Healthy Streets approach to create better environments and a healthier population.
76. Nonetheless, we have several, serious concerns about this blanket approach, which is particularly onerous. Whilst PTAL measures public transport accessibility in terms of proximity to bus and rail services, it does not consider the coverage of those services in terms of origins and destinations and therefore is an incomplete measure. It is not appropriate, in our view, for the car parking standards in the draft New London Plan to be articulated solely in terms of a PTAL score and the broad location bands of central, inner and outer London.
77. Town centres have an important function in attracting investment and vibrancy to an area. We note that the National Planning Policy Framework 2012 (NPPF) says that "planning policies should be positive [and] promote competitive town centre environments" and that local planning authorities should "recognise town centres as the heart of their communities and pursue policies to support their viability and vitality". The draft New London Plan conflicts with the plan-led approach and the framework set out in the NPPF.
78. From a development point of view, the success of retail and leisure activities in new town centre developments is a key component in generating the financial viability that is needed to support the delivery of a range of planning and community benefits. It is therefore essential that the Mayor's parking policies recognise the important role that town centre car parking has to play in order to support the vitality and viability of a centre and ensure its competitiveness against other existing centres with car parking provision. As we have stated elsewhere in these representations, the retail market is facing multi-faceted challenges and can ill afford these further restrictions on trading capabilities. This is key to achieving inclusive access to everything a town centre offers and will also support the aspirations of the Mayor to promote a vibrant night-time economy and a range of cultural, arts and leisure offers in London.

79. Town centre development with low, or zero, car parking also increases the risk of overspill parking into surrounding streets. This in turn requires additional management of parking in the wider area, through Controlled Parking Zones and similar approaches, which may have other impacts and costs on the existing community.
80. More broadly, we are concerned that the car parking standards in the draft New London Plan do not specifically reference 'town centres' which consist of a range of uses, where parking demands change over the course of the day and there is potential for effective, shared use of parking spaces. We believe that the draft New London Plan should deal with parking for town centres as distinct from retail and leisure parking (which are dealt with separately in the draft). We also believe that this should reflect a hierarchy of town centre types, together with accessibility. In particular the draft New London Plan should acknowledge that new town centre facilities in Opportunity Areas should be permitted to have appropriate levels of parking, recognising that this will support the establishing of vital and viable centres for new communities, the needs of the retail and leisure industries and their business considerations about locating in these areas and changing customer behaviours over time. We acknowledge that a more graduated progression to reduced levels of parking may be an appropriate approach, which would both influence and reflect behaviours over the next 20 to 25 years, with the potential for car parking locations to be redeveloped or re-purposed over time as levels of car usage fall.
81. The Canada Water Masterplan will provide around 54% less parking than is on site today whilst delivering around a 250% increase in retail and leisure floorspace. We note that Policy T6.3B recognises that existing parking provision is a starting point for assessing need ("...the starting point for assessing the need for parking provision at all new retail development should be the use of existing public provision, such as town centre parking."). The parking provision at Canada Water could be focused in one or two specific locations, will be available on a shared-use basis for all visitors to the development; and will not be allocated to specific users or occupiers. We also intend to implement a suitable charging arrangement to avoid long-term parking by commuters or visitors to central London, allowing the effective use of a much smaller number of spaces than is currently available at the site. The charging regime will also take account of charges present at other locations in the primary and secondary retail catchment areas to ensure broad alignment across the wider area.
82. We are keen to maintain the provision of car parking at a level which is appropriate to also increase travel by other modes, yet ensuring vibrant and successful town centres which offer choice for all and protect the existing community from extraneous traffic and car parking demand.
83. Our proposals at Canada Water will see around 80% of all car trips to the development being made by non-car modes. As such the car-borne mode share will be low for inner London and consistent with the Mayor's aspiration for less than 20% of journeys being made by car. This will be unprecedented for a major town centre in London and poses a major challenge to British Land in attracting retailers and leisure operators to take space in an untested location.
84. We would encourage the GLA and TfL to convene a meeting of the leading retail and leisure operators in the UK / London to seek their views on the emerging policy and the London Plan's general approach to the retail and leisure sector, town centres and high streets. British Land would be happy to use its excellent contacts with retailers and leisure operators to help set this up.
85. Until this meeting has taken place, we would urge the Mayor to reconsider his blanket approach to town centre car parking based on PTAL ratings and in Opportunity Areas which are as yet untested as retail destinations and permit some car parking to be provided to attract tenants, investment and custom.

86. The proposed approach has the potential to jeopardise the viability and competitiveness of emerging and growing town centres and retail developments, which would contradict the strategic aims of the Plan.

87. We feel that there is a balance to be struck, in acknowledging the role that car parking has to play in the short-medium term whilst striving to meet the aspirations of the Healthy Streets Agenda in the longer term. We would encourage the GLA / TfL to consider adopting a transitional arrangement based on a range of criteria in the future to allow for a move towards a much lower car parking environment in London - that might be supported by developers and retailers / leisure operators as it could be planned for and be brought into business planning and investment decision making.

02 March 2018

Paddington Central – 958k sq ft



Regent's Place – 1.7m sq ft



Broadgate – 4.85m sq ft



London Assets

£10.1bn assets under management

£7.9bn of which we own

6.6m sq ft of office space of which 80% is located across our 3 Campuses

2.6m sq ft of retail floor space

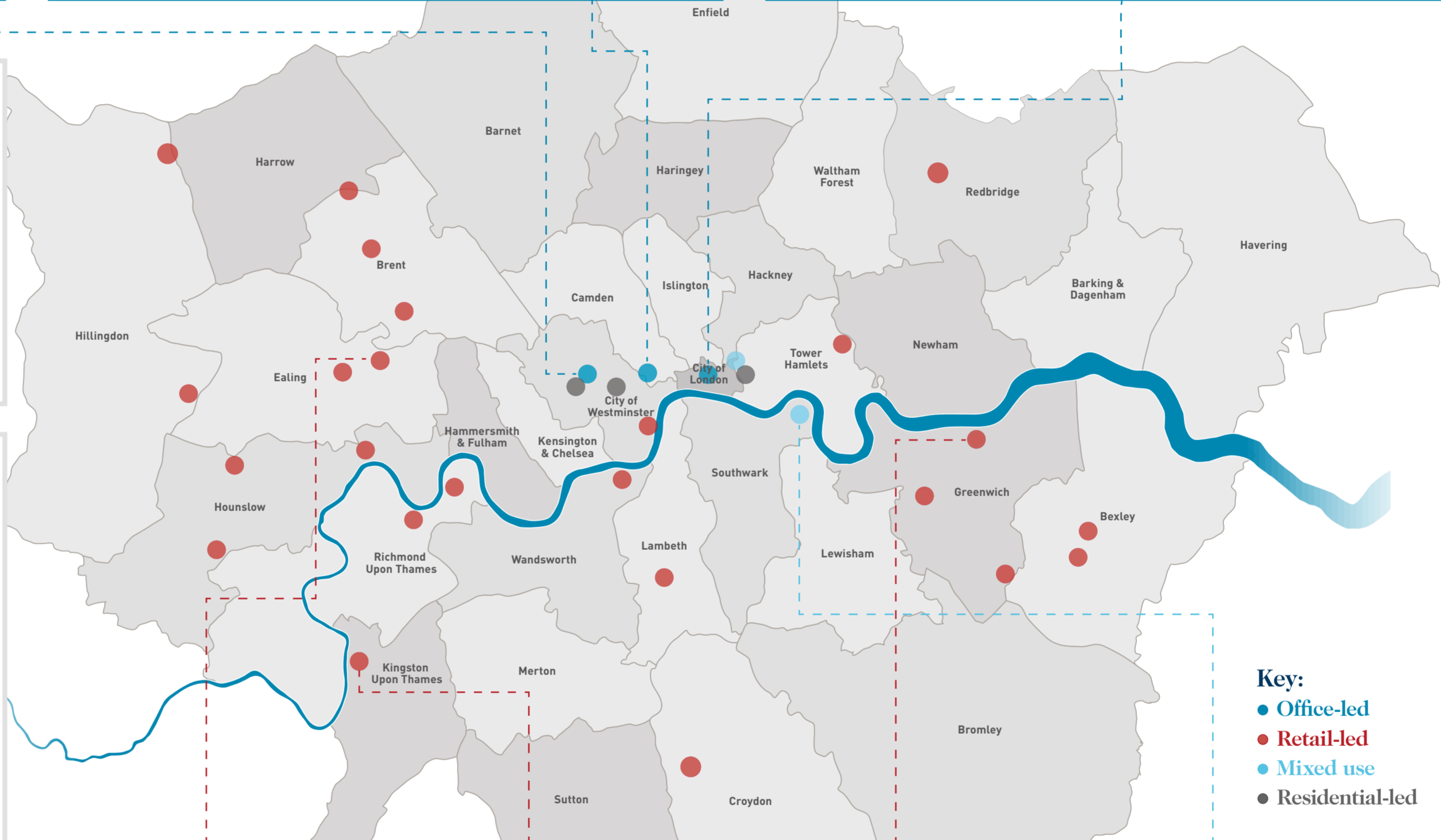
5 multi-let retail assets

9 stand-alone superstores, department stores and high street shops

12 leisure assets

Development pipeline

Development pipeline	Sector	Local Authority	BL Share %	Sq ft	Timeline
100 Liverpool Street	Office-led	City of London Corporation	50	522k	Committed
1 Finsbury Avenue	Office-led	City of London Corporation	50	288k	Committed
1 Triton Square	Office-led	London Borough of Camden	100	366k	Committed
135 Bishopsgate	Office-led	City of London Corporation	50	325k	Near term
Gateway Building	Leisure	Paddington Central	100	105k	Near term
2-3 Finsbury Avenue	Office-led	City of London Corporation	50	563k	Medium term
1-2 Broadgate	Office-led	City of London Corporation	50	471k	Medium term
Blossom Street	Mixed use	Tower Hamlets	100	340k	Medium term
5 Kingdom Street	Office-led	Paddington Central	100	332k	Medium term
Aldgate Place Phase 2	Residential	Tower Hamlets	50	145k	Medium term
Ealing Broadway	Retail	Ealing	100	300k	Medium term
Eden Walk	Mixed use	Kingston	50	533k	Medium term
Canada Water	Mixed use	Southwark	100	5.5m	Medium / Long term



Ealing Broadway – 540k sq ft



Eden Walk, Kingston – 287k sq ft



Woolwich – 360k sq ft



Canada Water – 5.5m sq ft