

Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
Post Point 18
FREEPOST RTJC-XBZZ-GJKZ
London SE1

2nd March 2018

By Email

Dear Mr Khan,

RESPONSE TO THE DRAFT LONDON PLAN ON BEHALF OF CBRE GLOBAL INVESTORS

CBRE Planning is instructed by CBRE Global Investors to make representations to the Draft London Plan (December 2017), recently published by the Mayor of London.

CBRE Global Investors

CBRE Global Investors is one of the world's largest property investment management firms. The company acts on behalf of 30 UK corporate pension schemes, local authority pension schemes, life insurers and a range of other overseas institutional investors. Collectively these long term investors have ownerships amounting to £4.1bn across the London Boroughs in more than 200 properties. These include a wide range of commercial, industrial, retail and mixed-use properties. CBRE Global Investors takes a stewardship role for these sites, ensuring their continued success and performance in contributing towards London and the region's economies. These representations are submitted on behalf of CBRE Global Investors' clients.

Representations to the Draft London Plan

Economy

As a holder of many significant office, industrial and mixed-use employment sites across London, CBRE Global Investors has a key interest in maintaining and enhancing key performing sites and managing the appropriate supply of employment floorspace.

Policy E1 (Offices)

Policy E1 seeks to improve the competitiveness and quality of office space of different sizes (for micro, small, medium-sized and larger enterprises) through the provision of new office space, refurbishment and mixed-use development.

Part B of Policy E1 states that the increases in the current stock of offices should be supported, where there is authoritative, strategic and local evidence of sustained demand for office-based activities, taking account of projected demand for office-based employment and office floorspace to 2041. The projected demand shown

in Table 6.1 shows that the office floorspace demand throughout London as a whole is expected to double between 2016-2041.

Part C of the policy seeks to promote the Central Activities Zone (CAZ), NIOD (Northern Isle of Dogs) and other nationally-significant office locations throughout London, as well as town centres and existing office clusters outside of Central London. Parts E and G of the policy concern the reuse and redevelopment of office floorspace.

CBRE Global Investors supports the protection and increase in office stock throughout London, through the development of new office schemes, mixed-use schemes and extension and refurbishment of existing office buildings. CBRE Global Investors particularly supports the protection of office floorspace within the CAZ, NIOD and other nationally significant office locations, as well as appropriately located town centres and sustainably located office clusters. CBRE Global Investors supports the reuse or redevelopment of office floorspace in the appropriate locations.

Policy E2 (Low-cost business Space)

Policy E2 seeks to provide and protect a range of low-cost B1 business space to meet the needs of micro, small and medium sized enterprises and support firms wishing to start up or expand. Part C of Policy E2 states that development proposals for new B1 business floorspace greater than 2,500sqm (GEA) should consider the scope to provide a proportion of flexible workspace suitable for micro, small and medium-sized enterprises.

Office Development

Although CBRE Global Investors sees the benefits of this policy at a strategic level, they do not consider it will be appropriate or effective in many cases and locations. Whilst the policy text recognises this, CBRE Global Investors requires certainty as to how this policy should be implemented at the Borough level. Many office developments across London, particularly those in areas of lower value, will be constrained by viability. London has a diverse range of office markets, as referenced at part D of Policy E1, and as such, price differentials and affordability is already factored in by the market-led approach to office development and subsequent leasing, i.e. low-cost and flexible workspace is already provided by virtue of some markets and locations achieving lower rental values.

Furthermore, flexible workspace is not appropriate for many developments and locations i.e. occupier-led developments, head offices, campus office developments, or within key office agglomerations etc. Where there is demand for flexible and co-working spaces these are already being promoted at local level and delivered as bespoke products in the right locations with good transport links, appropriate management and services/infrastructure to support the flexible needs of SMEs and similar businesses. This sector should continue to be supported in appropriate locations where there is a need for such space as part of the floorspace demand outlined in Policy E1.

Management, security and lease structure issues could also make such a requirement unattractive to and unworkable for landlords, landowners and developers. CBRE Global Investors considers that this may have a detrimental impact on the future supply of B1 business space. An inability to provide flexible workspace should not compromise the redevelopment, refurbishment or expansion of employment development, to meet the significant demand outline in Policy E1.

Furthermore, the policy threshold of 2,500 sq m is not strategic enough to consider the provision of flexible workspace. The requirement should only be for more major or regeneration schemes where such a provision is feasible and appropriate for inclusion as part of mixed-use employment schemes.

The requirement for proposals which may involve the loss or rationalisation of office space to address this is also flawed, as this element may act as a deterrent for bringing forward comprehensive new employment-led schemes, for the above viability reasons.

B1b/B1c Development

Light industrial floorspace (B1c) would currently be captured by this policy, which does not recognise the nature of B1c users and occupiers as needing industrial space, which, by the nature of B1c operations, has minimal need for 'flexibility' and smaller unit sizes. B1c occupiers would not typically share units, and have bespoke servicing and operational requirements relevant to the development bespoke sites, and cannot facilitate the introduction of other types of floorspace.

This is also likely to undermine the function of LSIS/SIL sites where relevant by virtue of compromising the attractiveness of new development to increase industrial or employment floorspace.

B1b floorspace should also be excluded from this policy approach, given the typically bespoke nature of research space led developments.

Policy Amendment Sought

Therefore, CBRE Global Investors do not consider that the strategic policy directive for the provision of flexible business space is currently effective or appropriate. More specific guidance on how policy should be formulated at local level (where the circumstances indicate it necessary to meet identified economic/social objectives, and evidence suggests this can be viably achieved) should be included, with a higher floorspace threshold, and for B1a land use only.

Policy E2 Low-cost business space

A The provision, and where appropriate, protection of a range of low-cost B1 business space should be ~~supported~~ considered to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand on strategic regeneration sites, supported by evidence.

B Development proposals that involve the loss of existing B1 space (including creative and artist studio space) in areas where there is an identified shortage of lower-cost space should:

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

C Development proposals for new B1a business floorspace on major regeneration sites ~~greater than 2,500 sqm (gross external area)~~ should consider the scope to provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises, where supported by evidence.

Policy E3 (Affordable Workspace)

Policy E3 seeks to ensure that in defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for a specific social, cultural or economic development purpose. Part B of this policy emphasises that particular consideration should be given to the need for affordable workspace in locations where there is existing affordable workspace, areas of cost pressures (such

as the City Fringe and Creative Enterprise Zones) and in areas where affordable workspace is deemed necessary or desirable to sustain mixed business/cultural uses.

As set out above in the response to Policy E2, CBRE Global Investors consider there to be many locations where affordable workspace would not be necessary and/or viable. It is considered the requirement to provide affordable workspace will dis-incentivise landowners and developers from redeveloping sites, significantly impacting on future employment land supply within London, which is at odds with the achievement of Policy E1.

Viability is frequently a challenge to employment-led developments on both new and existing employment sites. Therefore, policy elements which further constrain the developer returns will impact deliverability of sites. In terms of mixed use sites, these types of developments already frequently face viability constraints through the provision of other planning obligations including affordable housing, and therefore any additional requirements relating to scheme viability will undoubtedly challenge the realisation of other policy aims within the London Plan.

Office Development

Many office developments across London, particularly those in areas of lower value, will be constrained by viability. London has a diverse range of office markets, as referenced at part D of Policy E1, and as such, price differentials and affordability is already factored in by the market-led approach to office development and subsequent leasing, i.e. affordable workspace is already provided by virtue of some markets and locations achieving lower rental values.

Furthermore, affordable workspace is not appropriate for many developments and locations i.e. occupier-led developments, head offices, campus office developments, or within key office agglomerations etc.

Management, security and lease structure issues will also make such a requirement unattractive to and unworkable for landlords, landowners and developers who favour strong covenants and security of tenure. CBRE Global Investors considers that this will have a detrimental impact on the future supply of B1 business space. An inability to provide flexible workspace should not compromise the redevelopment, refurbishment or expansion of employment development, to meet the significant demand outline in Policy E1.

Industrial/Warehousing Development

Industrial and warehousing floorspace would also currently be captured by this policy, which does not recognise the nature of these users and occupiers as needing industrial/warehousing space, which, by the nature of their operations requires single-occupancy units and service yard areas. These occupiers would not typically share units, and have bespoke servicing and operational requirements relevant to the development bespoke sites, and cannot facilitate the introduction of other types of workspace within new developments.

This is also likely to undermine the function of LSIS/SIL sites where relevant by virtue of compromising the attractiveness of new development to increase industrial or employment floorspace.

Policy Amendment Sought

With this in mind, CBRE Global Investors believe this policy should have stricter and more detailed guidance on the 'defined circumstances' under which it should be formulated at a local level, i.e. only where it is deemed necessary to meet identified, evidenced economic/social objectives which are reflected in site-specific viability approaches. The 'local evidence' referenced in the policy should also be further defined within the supporting text to ensure that if the policy is brought forward, the parameters are clear to both Boroughs and applicants.

[Policy E3 Affordable workspace](#)

A In defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose.

Such circumstances include workspace that is: ...

B Particular consideration should be given to the need for affordable workspace for the purposes in part A above:

- 1) where there is existing affordable workspace on-site*
- 2) in areas where cost pressures could lead to the loss of affordable workspace for micro, small and medium-sized enterprises (such as in the City Fringe around the CAZ and in Creative Enterprise Zones)*
- 3) in locations where the provision of affordable workspace would be necessary or desirable to sustain a mix of business or cultural uses which contribute to the character of an area.*
- 4) as part of development schemes where it is evidenced that it is viable to provide such workspace.*

C Boroughs, in their Development Plans, are encouraged to consider more detailed affordable workspace policies in light of local evidence of need and viability. These may include policies on site-specific locations, or defining areas of need for certain kinds of affordable workspace.

D Affordable workspace policies defined in Development Plans and Section 106 agreements should include ways of monitoring that the objectives in part A above are being met, including evidence that they will be managed by a workspace provider with a long-term commitment to maintaining the agreed or intended social, cultural or economic impact. Applicants are encouraged to engage with workspace providers at an early stage to ensure that the space is configured and managed efficiently.

E Leases or transfers of space to workspace providers should be at rates that allow providers to manage effective workspace with sub-market rents, meeting the objectives in part A, over the long term.

F The affordable workspace elements of a mixed-use scheme should be operational prior to residential elements being occupied.

Policy E4 (Land for industry, logistics and services to support London's economic function)

Policy E4 seeks to ensure that a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related function is maintained.

Part E of this policy sets out the circumstances for release of industrial capacity, which should be in well-connected locations and contribute towards other planning priorities including housing and affordable housing. This part of the policy is supported as it will allow the release of industrial sites which could be brought into other uses, including housing, in the right locations where sustainably connected.

Part H of this policy requires development proposals for large-scale (greater than 2,500 sqm GIA) industrial floorspace should consider the scope to provide smaller industrial units suitable for SMEs, in particular where there is a local shortage and demand for such space.

Although CBRE Global Investors support the overall objective of this policy, to ensure a sufficient supply of industrial, logistics and services land is maintained, CGRE GI would like to express serious concern with regards to Part H. As discussed above in relation to Policy E2, the provision of units suitable for SMEs is unfeasible to many industrial and logistics operators across London. Locational and contextual factors in some areas of London mean there is no demand for SMEs and their provision is unviable. Secondly, industrial uses are often not 'small' or 'medium' sized, and even industrial companies classed as SMEs, will require larger spaces to operate with a single footprint on a dedicated site due to the nature of their operations. These

occupiers would not typically share units, and have bespoke servicing and operational requirements relevant to the development of bespoke sites, and cannot facilitate the introduction of other types of workspace within new developments. Management, security and lease structure issues will also make such a requirement unattractive to and unworkable for landlords, landowners and developers.

As discussed above in relation to policy E2, 2,500 sq m is not a major development scheme, even more so for industrial uses. The threshold should be significantly higher to capture such requirement only on major regeneration schemes with the capacity to offer a range of types of industrial space, including the above.

Where such space is desirable from a market and occupier perspective, developers will likely factor this in in any case to new developments or redevelopments of existing industrial sites in the appropriate locations.

Policy Amendment Sought

The requirement for large-scale industrial space of over 2,500sqm GIA to also provide smaller units, is not considered appropriate and as such, **part H of Policy E4 should be removed** or amended to stipulate a far higher floorspace threshold, appropriate to the scale of large industrial developments.

Policy E7 (Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function)

Policy E7 sets out the Draft London Plan's policies in relation to intensification, co-location and substitution for industrial, logistics and servicing land.

Part A of the policy sets out the proposed methods for intensifying industrial uses through:

- 1) *development of mezzanines*
- 2) *introduction of small units*
- 3) *development of multi-storey schemes*
- 4) *addition of basements*
- 5) *more efficient use of land through higher plot ratios having regard to operational requirements (including servicing) and mitigating impacts on the transport network where necessary.*

CBRE Global Investors supports the aim to deliver additional industrial floorspace on sites with capacity for the above, however, requests that this part of the policy is better evidenced to demonstrate how these elements can work in practice. Many industrial and warehousing occupiers require large, single storey units with high roof voids and large servicing yards (which reduce the plot ratios) due to the nature of their operations. Furthermore, as set out above in the responses to Policies E2, E3 and E4, small multi-tenanted units are not typical of these use classes and can be unattractive to industrial/warehousing developers and landlords. Where these types of developments are promoted and progressed, CBRE Global Investors suggest that developer incentives be promoted such as a reduction in CIL liabilities and where appropriate, forms of enabling development (discussed further under Part D below). This is because a number of the suggestions for intensification are likely to have impacts on viability (particularly basement and multi-storey schemes), where industrial and warehousing land values alone would be unlikely to support such development. We would therefore request an amendment to the policy as set out below.

Parts B and C of the Policy set out the circumstances under which SIL/LSIS land will be reviewed and considered for intensification or release and note that this should not be done through 'ad hoc planning applications', but as part of a plan-led process. CBRE Global Investors has concerns about this, given the

diversity of progress across London Boroughs in Development Plans and the potential delays and threat to delivery that this could cause. We reiterate the same concerns regarding part F of the Policy.

Part D states that mixed-use or residential development proposals on Non-Designated Industrial Sites will be supported where:

- 1) *there is no reasonable prospect of the site being used for the industrial and related purposes set out in part A of Policy E4 Land for industry, logistics and services to support London's economic function; or*
- 2) *it has been allocated in a Development Plan for residential or mixed-use development on the basis of part D.1; or*
- 3) *industrial, storage or distribution floorspace is provided as part of mixed-use intensification where this is feasible; or*
- 4) *suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and subject to relocation support arrangements for existing businesses before the commencement of new development.*

CBRE Global Investors support the co-location of uses in appropriate locations. Co-location will, and has, been successful on a number of sites throughout London, the rest of the UK and abroad, and clearly has the potential to provide significant benefits, particularly in relation to the development of redundant industrial land. CBRE Global Investors therefore requests that the Mayor considers in more depth how to address the deliverability and feasibility issues associated with co-location, and provides the requisite evidence.

Part E of the Policy provides specific guidance on how the above parts of the policy should be implemented and undertaken. Notwithstanding the above comments on the feasibility of this policy approach, we consider there are a number of inherent conflicts within this approach, which render the initial parts of the policy (A to D) irrelevant, i.e. requiring both intensification but the provision of yard space and co-location of uses but support for 24 hour access. Furthermore, given the viability challenges described above relating to the delivery of such sites, and the likely need for residential development to act as 'enabling' development, part 3 of part E of the Policy should be removed. The full proposed amendments are detailed below.

Policy Amendment Sought

A Development Plans and development proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land through, [where appropriate, feasible and viable, the following:](#)

- 1) *development of mezzanines*
- 2) *introduction of small units*
- 3) *development of multi-storey schemes*
- 4) *addition of basements*
- 5) *more efficient use of land through higher plot ratios having regard to operational requirements (including servicing) and mitigating impacts on the transport network where necessary.*

B Development Plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SILs could be intensified. Intensification should facilitate the consolidation of the identified SIL to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process must meet the criteria set out in part E below and ensure that it does not undermine or compromise the integrity or effectiveness of the SIL in accommodating the industrial-type activities identified in part C of Policy E5 Strategic Industrial Locations (SIL). This approach should ~~only~~ be considered as part of a plan-led process of SIL

intensification and consolidation (and the areas affected clearly defined in Development Plan policies maps) or as part of a co-ordinated **application-led** masterplanning process in collaboration with the GLA and relevant borough, ~~and not through ad hoc planning applications.~~

C Development Plans and planning frameworks should be proactive and consider whether certain logistics, industrial and related functions in selected parts of LSIS could be intensified and/or co-located with residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process should meet the criteria set out in part E below. This approach should ~~only~~ be considered as part of a plan-led process of SIL intensification and consolidation (and the areas affected clearly defined in Development Plan policies maps) or as part of a co-ordinated **application-led** masterplanning process in collaboration with the GLA and relevant borough, ~~and not through ad hoc planning applications.~~

D Mixed-use or residential development proposals on Non-Designated Industrial Sites will be supported where:

- 1) there is no reasonable prospect of the site being used for the industrial and related purposes set out in part A of Policy E4 Land for industry, logistics and services to support London's economic function; or
- 2) it has been allocated in a Development Plan for residential or mixed-use development on the basis of part D.1; or
- 3) industrial, storage or distribution floorspace is provided as part of mixed-use intensification where this is feasible; or
- 4) suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and subject to relocation support arrangements for existing businesses before the commencement of new development.

Mixed-use development proposals on Non-Designated Industrial Sites which co-locate industrial, storage or distribution floorspace with residential and/or other uses should also meet the criteria set out in parts E.2 to E.4 below.

E The processes set out in Parts B, C and D above must ensure that:

- 1) the industrial uses within the SIL or LSIS are intensified to deliver an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace ~~with appropriate provision of yard space for servicing~~
- 2) the industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non-Designated Industrial Site are not **significantly** compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation ~~noting that many businesses have 7-day/24-hour access and operational requirements~~
- ~~3) the intensified industrial, storage and distribution uses are completed and operational in advance of any residential component being occupied~~
- 3) appropriate design mitigation is provided in any residential element to ensure compliance with 1 and 2 above with particular consideration given to: ...

F Development Plans and planning frameworks should consider, in collaboration with neighbouring authorities within and outside London, the scope to facilitate the substitution of some of London's industrial capacity to related property markets elsewhere in London and beyond London's boundary where:

- 1) this results in mutual advantage to collaboration partners inside and outside London and supports a more efficient use of land

2) full regard is given to both the positive and negative impacts of substitution including impacts on servicing the economy inside and outside London, businesses and customers, labour markets and commuting, supply-chains and logistics, congestion, pollution and vehicle miles

3) a clearly-defined strategy for the substitution of future demand capacity and/or relocation arrangements where relevant, is in place to support this process.

This approach should only be considered as part of a plan-led process of consolidation and intensification (and clearly defined in Development Plan policies maps) *or through a comprehensive planning application process and not through ad-hoc planning applications.*

Housing

Policy H6 (Threshold approach to applications)

Policy H6 states that a threshold approach to allow planning applications to be 'fast tracked' (i.e. not having to provide a viability appraisal at application submission stage) should be applied to affordable housing within development proposals capable of delivering more than 10 units. The threshold level of affordable housing is initially set at:

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

Points 1) and 2) were included in the Mayor's Affordable Housing and Viability SPG (2017) Consultation, however, point 3), which requires SIL/LSISs to also provide 50% affordable housing, was not, and was included within the adopted version without having undergone a formal consultation process.

CBRE Global Investors does not consider the 50% requirement for SILs, LSISs and other industrial sites appropriate given the aim of the policy to maximise the efficient use of land to deliver mixed-use residential schemes which include affordable housing. LSIS/SIL-led mixed-use development already faces development constraints as set out in the discussion regarding Policy E7, and therefore, further requirements to provide significantly higher levels of affordable housing as well as preserving industrial floorspace on underperforming industrial sites will not achieve positive planning.

There are implications in terms of viability, deliverability, density and design. Many industrial sites are contaminated and complex brownfield sites. As such, it is at significant risk that developers will proceed with such proposals, particularly if these are co-located with industrial uses and required to provide 50% affordable housing. Redundant industrial land is an important source of housing supply which should be optimised, and it is considered that this policy will discourage its redevelopment, which will work against the strategic aims of the plan.

Therefore, there is unlikely to be sufficient incentive for developers or landowners to bring forward SIL/LSIS sites for intensification and co-location of uses as promoted by Policy E7, given the minimised developer return which would render sites unviable, and may risk development which is caught by the affordable housing review mechanism as stipulated within the Mayor's Affordable Housing SPG. Furthermore, due to the uncertainty and protracted timescales associated with the non-fast tracked route, it is highly unlikely that such sites will come forward for development of residential uses, which will restrict and constrain a significant source of housing supply from these sites.

Under Policy H6 part D there is a requirement for Fast Tracked applications to undergo a viability review should an agreed delivery timescale (two years from implementation is suggested albeit could be varied at the Borough level) not have been met. This element of the policy is not considered to represent positive planning as applicants who have provided a policy compliant affordable housing mix in order to speed up delivery through the planning process could then be penalised with further delays and obligations during the delivery phase of development, thus providing limited incentive for applicants to follow the Fast Track route. Major schemes providing affordable housing can easily take more than 2 years to progress to implementations and delivery, particularly brownfield sites which are subject to outline planning permission for example. Land ownership constraints and site preparation works are likely to cause longer timescales for implementation. Furthermore, such policy will add delay to implementation given the level of uncertainty over the financial returns from the development, which will have significant implications on land disposal for delivery to housebuilders and Registered Providers.

Part E (2) of the Policy stipulates that where applications have been viability tested, they will be subject to at least two subsequent reviews, one at 2 years as above, and one on completion of 75% of unit sales/lettings. Further reviews mid-phase may be added by Boroughs.

For the reasons above, and the addition reasons that, if an applicant has gone through the arduous viability review process, there should not be further burden placed on the re-assessment of this given that the applicant and Borough will have rigorously tested and agreed an appropriate level of Affordable Housing provision to make the development acceptable.

We therefore propose that the timescales for review be extended to reflect the reality of delivery of complex urban sites, to 5 years post-grant of planning permission/implementation.

Proposed Policy Amendment Sought

CBRE Global Investors does not consider this 50% affordable housing requirement appropriate on SIL/LSIS sites, and would request that **point 3 of Policy H6 be removed**. Furthermore, we propose that **the viability review triggers in part D and E are explicitly extended within the policy wording to 5 years** to provide sufficient yet realistic incentive for delivery.

Policy H1 (Increasing Housing Supply)

Policy H1 seeks to ensure the ten-year targets for net housing completions, which each local planning authority should plan for, are achieved. The policy goes on to state that borough should optimise the potential for housing delivery on all suitable and available brownfield sites, especially the following sources of capacity:

- a. *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;*
- b. *mixed-use redevelopment of car parks and low-density retail parks;*
- c. *housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses;*
- d. *the redevelopment of surplus utilities and public sector owned sites;*
- e. *small housing sites (see Policy H2 Small sites);*
- f. *industrial sites that have been identified through the processes set out in Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function.*

CBRE Global Investors supports this policy, and welcomes targets to increase housing supply, height and density in relation to both existing and proposed infrastructure and in sustainable locations. It is considered that this policy successfully promotes an increased housing supply in sustainable locations.

Town Centres, Retail and Tourism

Policy SD6 (Town Centres)

Policy SD6 seeks to ensure London's varied town centres and their vitality and viability are promoted and enhanced. The policy states that town centres should be locations for mixed-use and housing-led intensification and higher-density renewal, securing a high-quality environment and complementing local character and heritage assets.

Part C of the policy states that the potential for new housing within and on the edges of town centres should be realised through higher-density mixed-use or residential development.

CBRE Global Investors supports the principle of increasing density within town centres for a range of uses including residential.

Policy E9 (Retail, markets and hot food takeaways)

Policy E9 seeks to ensure a successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners. The policy states that development plans should identify sites for consolidation of retail space where this is surplus to requirements.

CBRE Global Investors supports the consolidation of retail space and the diversification and redevelopment of surplus retail and car park sites. It is considered that this is important to creating successful, competitive and diverse town centres.

Policy E10 (Visitor Infrastructure)

Policy E10 seeks to strengthen London's visitor economy and associated employment, and extend its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure. Part C specifically refers to the sufficient capacity of visitor accommodation and provision of high-quality convention facilities in town centres and in and around the CAZ.

CBRE Global Investors supports this policy, which seeks to enhance the visitor economy throughout London. This should be particularly focused towards the CAZ and sustainable locations, such as town centres and Opportunity Areas. CBRE Global Investors also considers that visitor accommodation should also be provided in areas of future planned infrastructure where appropriate, with links to central London and other key visitor requirements and that these points should be added to part E of the Policy.

Proposed Policy Amendment Sought

E In outer London and those parts of inner London outside the CAZ, serviced accommodation should be promoted in town centres and within Opportunity Areas where they are well-connected by public transport (existing and planned), particularly to central London and other key employment or tourist destinations.

Policy GG2 (Making the best use of land)

Policy GG2 states that to create high-density, mixed-use places that make the best use of land, those involved in planning and development must:

- a) *Prioritise the development of Opportunity Areas, brownfield land, surplus public-sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites.*
- b) *Proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design-led approach.*
- c) *Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London's distinct and varied character.*
- d) *Protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening.*

CBRE Global Investors supports the provision of high density mixed-use development in Opportunity Areas, on brownfield land and on well-connected sites. It is considered that these are the locations in which housing must be concentrated and maximised. In particular, CBRE Global Investors represents and has interests in a number of sites within Opportunity Areas. As such, they wish to support significant growth within Opportunity Areas, and would like to work with Boroughs and the GLA to deliver proactive and deliverable planning solutions.

Summary

CBRE Global Investors would welcome the opportunity for engagement with the GLA with regards to the policies and associated representations discussed above. As substantial long term investors, it is important that CBRE Global Investors is able to protect and enhance the property investments that it has made within the capital, and ensure that development opportunities can be pursued, where sustainable and appropriate, for the benefit of its clients and London.

I trust that the above is helpful and would request that CBRE Global Investors be informed on the draft London Plan process and milestones, including changes made to the document as a result of this consultation. CBRE Global Investors reserves the right for a representative to attend the London Plan Examination in Public.

Yours sincerely,

JONATHAN STODDART
HEAD OF LONDON PLANNING

Cc: CBRE Global Investors