

Aylward Planning comments

King and Company Ltd (oliver@kingandcompany.co.uk)

Page: [Policy GG1 Building strong and inclusive communities](#)

Section: [N/A](#)

We broadly welcome the objectives of policy GG1.

We would reflect that the aspiration to deliver good growth in locations close to transport hubs could also give rise to competing influences. We conclude that substantial positive weight should be afforded to schemes that can offer high density through quality design with appropriate weight given to competing planning influences.

Page: [Policy GG2 Making the best use of land](#)

Section: [N/A](#)

We broadly welcome the objectives of policy GG2.

We would reflect that the aspiration to deliver good growth in locations close to transport hubs is highly commendable. Locating development close to transport hubs provides the opportunity for accessibility and through reference to design standards obliges the developer to create schemes that are inclusive and cater for a range of needs.

However, given that these opportunity sites will inevitably be located within the existing urban fabric they could also give rise to competing influences. The overriding challenge is to deliver density in sustainable locations, and we conclude that substantial positive weight should be afforded to schemes that can offer high density through quality design with appropriate weight given to competing planning influences which could include matters such as heritage planning.

A higher density approach often provides the opportunity to deliver more affordable housing and indeed affordable workspace on a given site, which should again be afforded positive weight.

Page: [Policy GG3 Creating a healthy city](#)

Section: [N/A](#)

We welcome the objectives and aspirations set out by Policy GG3.

Clearly there is an opportunity to deliver more development close to public transport nodes which are highly accessible. By putting new development (employment and housing) close to transport nodes then it provides a key and sensible opportunity to reduce reliance on the public car and indeed to make many journeys capable of being completed on foot or by cycle.

The reduced reliance on the public car can improve air quality but can also indirectly increase participation in physical exercise and other healthy lifestyle choices.

Page: [Policy GG4 Delivering the homes Londoners need](#)

Section: [N/A](#)

We broadly welcome the objectives of policy GG4.

The key driver through the London Plan is to recognise the need to deliver more housing, and focus upon the challenges and opportunities to ensure that the objective is achieved.

High density development will not be appropriate in all locations, but we fully endorse the aspiration that the development industry should expect to deliver higher density schemes in locations close to transport hubs. Nevertheless, those locations will very typically be sited tightly within the urban grain and there will inevitably be other competing influences with reference to how that high density scheme (potentially a tall building) might interact with existing buildings some of which may be locally important.

The overriding challenge is to deliver density in sustainable locations, and we conclude that substantial positive weight should be afforded to schemes that can offer high density through quality design with appropriate weight given to competing planning influences.

High density solutions can provide the mechanism by which sites can support mixed uses and the affordable homes that are so clearly needed. A higher density approach often provides the opportunity to deliver more affordable housing on a given site, which should again be afforded positive weight.

Page: [Policy GG5 Growing a good economy](#)

Section: [N/A](#)

We broadly support the objectives set out in Policy GG5.

We flag that aspirations to achieve high levels of environmental performance (such as higher levels of BREEAM certification) are laudable but that it will be important to sense-check that those obligations do not impede deliverability and viability in locations outside the highest demand locations.

There is a risk that a blanket application of BREEAM standards could result in a situation where construction costs escalate to a point where the resultant office development would struggle to be let on a commercial basis because it proves impossible to provide affordable workspace. Clearly such issues are less prevalent in areas of the highest market demand, but there should be a recognition that this will vary markedly by location and it could impede investment in more marginal locations.

Page: [Policy GG6 Increasing efficiency and resilience](#)

Section: [N/A](#)

We welcome the broad objectives of Policy GG6 but place caution in terms of any blanket application of environmental standards such as BREEAM.

It is understood anecdotally that the uplift in construction costs from a Building Regulations compliant office scheme to one requiring BREEAM Excellent is substantial and in non-prime locations can make otherwise deliverable office schemes marginal or non-viable. Whilst we fully support the ambition to ensure that new development minimises resource use in construction and operation, we reflect that BREEAM is a blunt tool and could (if applied in a blanket fashion) impede the delivery of quality employment space in marginal locations.

Page: [Policy SD6 Town centres](#)

Section: [N/A](#)

We broadly support the objectives of Policy SD6, but particularly criterion C.

In many locations, there are highly sustainable opportunity sites close to defined centres and also close to transport hubs. We therefore support the opportunity for proposals close to defined centres to drive up opportunities for high density and mixed use development.

With reference to the hierarchy of centres, this can be equally applicable for higher order centres through to other lower order centres.

Page: [Policy D1 London's form and characteristics](#)

Section: [N/A](#)

We regretfully object to Policy D1.

The policy sets out objectives to deliver good growth, with specific reference to some matters which will inevitably represent a design challenge when high density design solutions are encouraged within a well developed urban fabric.

Introducing taller buildings into an urban area will create challenges and competing pressures in terms of the relationships with established buildings or other elements of streetscape. However, quality design solutions can arrive at a redevelopment wherein a taller building can provide a landmark which is a positive addition to the area read as a whole, albeit that in some instances that might lead to the loss and replacement of street trees for example.

We would encourage that this policy be reconsidered to provide a more rounded framework to give LPAs the ability to deliver higher density development with due but not excessive regard had to competing influences.

Page: [Policy D2 Delivering good design](#)

Section: [N/A](#)

Support - We fully support the objectives and guidance of Policy D2.

It very clearly sets out that it is crucial for design solutions to be informed by a clear understanding of local conditions and for this context and design vision to be very straightforwardly set out in the submission material. It is also encouraging that early pre-application dialogue is being afforded positive weight and we welcome the GLA's active interest in shaping proposals for both larger and smaller sites which are equally important in delivering the step-change in design quality and the supply of well considered homes and spaces for Londoners over the Plan period.

Page: [Policy D3 Inclusive design](#)

Section: [N/A](#)

We fully support these objectives.

Page: [Policy D6 Optimising housing density](#)

Section: [N/A](#)

We fully support the objectives of Policy D6.

We particularly endorse the advice of paragraph 3.6.1 which clarifies that the delivery of high density will inevitably mean that proposals will need to deliver greater density than is provided already in the locality.

In many instances, a drive to secure density will lead towards solutions with taller buildings and/or solutions which might change the established building line. Clearly that could result in competing challenges, but we think it is vitally important that very strong positive weight is afforded to securing higher density especially in sustainable locations.

It may be appropriate in some instances to review other planning tools such as Conservation Area Management Plans with a view to how the competing objectives can be best reconciled, with a view to driving up delivery through a higher density approach.

Page: [Policy D7 Public realm](#)

Section: [N/A](#)

We agree that public realm can deliver substantial improvement to design quality and make for spaces that are more liveable and more enjoyable. Improved vitality and sense of place are key drivers to what make for good growth and positive planning.

The delivery of quality public realm can be best secured through arrival at the best design solution, which will not necessarily involve the retention of all existing green space or street trees. This may on occasion facilitate a change in building line which would allow the optimisation of density and the delivery of public realm in a different but important part of the site. Where any such existing assets are to be removed they should be properly replaced in qualitative terms.

Page: [Policy D8 Tall buildings](#)

Section: [N/A](#)

We broadly support the objectives and advice of Policy D8.

Clearly tall building proposals create a design challenge, and it is important that they are sensitively designed to contribute positively to the urban fabric. We particularly agree that the treatment of the base section of the building is important as it frames the streetscape and the experience of the building at a human scale.

Clearly the drive for density and the delivery of a range of objectives (such as environmental performance and affordable housing and workspace) and in locations outside the absolute prime pitch these will inevitably create viability challenges. In certain instances, the opportunity for a taller building will represent the best and most appropriate design solution.

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

Section: [N/A](#)

We fully support the ambitions of Policy H1 to drive up density and delivery.

This should and will be achieved by a range of measures, but foremost should be the driver to deliver real change and high density development in the most accessible locations close to public transport hubs.

These locations will inevitably be sited within the urban fabric and there will be design challenges. However, through strong design and leadership there will be the ability to deliver landmark schemes that contribute positively to streetscape and the vitality of these central urban areas.

Page: [Policy H5 Delivering affordable housing](#)

Section: [N/A](#)

We broadly endorse the ambition to create a step-change in the delivery of affordable housing. The affordable requirement (in terms of type and tenure) needs to respond to market signals, and will include family homes as well as apartments for young professionals and key workers.

Read in tandem with the threshold approach (under policy H6) we support the ambition to deliver affordable housing that meets local needs and has inherent flexibility to accommodate different vehicles (which might include PRS or help to buy) that result in the delivery of more homes that are well designed and affordable for Londoners.

We would also note that there are a range of competing pressures which will impact upon the deliverability of brownfield sites close to public transport hubs. These will include environmental performance, affordable workspaces and some elements of policy which would resist buildings which are materially taller or occupy more footprint than the existing.

The design challenge is often substantial, but we conclude that the highest priority should be put upon the delivery of affordable housing and workspaces.

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

Section: [N/A](#)

We broadly support the objectives and approach of Policy H7 which sets out high level objectives, but also clarifies details of the implementation approach and in respect of the key definitions.

We particularly welcome the reference to a consideration of a range of delivery vehicles to secure homes which can provide the homes which Londoners can afford. This will include the traditional models which are identified but might also include other tenures such as PRS and help to buy.

Our view is that the key driver should be to deliver the optimum number of homes which are within the reach of London's key workers and young families, and a pragmatic approach is the best way to streamline that delivery.

Page: [Policy H13 Build to Rent](#)

Section: [N/A](#)

We broadly support policy H13 and welcome the clear framework which has been set out.

We would place a note of caution that the framework appears somewhat rigid, and would encourage that the GLA provides themselves some flexibility to respond to market signals in due course. The polic might otherwise (and unintentionally) impede delivery if market conditions move "against" the policy.

Page: [Policy E1 Offices](#)

Section: [N/A](#)

In many locations, there will be an opportunity and ambition to deliver vibrant mixed use development close to public transport hubs. Those locations will very typically be within the urban grain and previously developed.

In marginal locations, policy obligations to deliver high levels of environmental performance create substantial viability challenges because they can impact upon the ability to clear brownfield sites and deliver mixed use development including offices which would represent affordable workspace.

We would welcome that strong positive weight be put upon the delivery of office space in marginal locations as part of mixed use schemes, to be weighed in the balance alongside issues of density and the realisation of other competing planning objectives.

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

Section: [N/A](#)

We support policy E2 but do not feel that it goes far enough.

There is a reference through the policy in terms of the importance of providing a quantum of low-cost business space and resistance to proposals that would result in that supply being impacted.

It does not (regrettably) provide much advice in terms of the potential to deliver new low cost employment space relative to other locations. The market returns for office accommodation will vary substantially across the city, far more than the relative construction costs would vary. Substantial positive weight should be afforded to schemes that can deliver low cost business space as part of mixed-use schemes and this should be weighed in the planning balance.

Page: [Policy E3 Affordable workspace](#)

Section: [N/A](#)

This policy (E3) reads to say that developers should provide workspace which is pitched at below market levels. This may be workable in certain instances and in locations with optimal market conditions. However, in many instances (particularly in the Outer London locations) the cost of delivering new build workspace with the specification levels sought by other policy objectives makes the deliverability of the workspace in the marketplace at a competitive rental extremely marginal. To then oblige the developer to rent out space at a level beneath that will impede the delivery of affordable workspace.

Page: [Policy HC1 Heritage conservation and growth](#)

Section: [N/A](#)

The drivers for good growth place challenges on developers and planning authorities to increase the density of development close to public transport hubs.

Those locations are typically very well established parts of the urban grain and can include buildings and areas of some historic interest. It would be possible to interpret HC1 in such a way that it impeded the opportunity for good growth and density close to areas of historic interest.

The key is to look at each case and to assess the significance of heritage assets, and then to determine the extent to which a development proposal would genuinely harm that significance. That would result in a particular judgment, and that should be weighed in the balance with competing planning objectives.

There are numerous examples of landmark buildings which have been tested against a framework of buildings which have substantial significance as well as those with lesser heritage significance. In these instances there is a more substantial design challenge to result in a scheme that provides a net positive contribution in wider planning terms.

We are concerned that policy HC1 does not set these matters out in that broader context.

Page: [Policy HC3 Strategic and Local Views](#)

Section: [N/A](#)

We support the concepts set out by this policy and the very clear framework in terms of strategic views.

We are however concerned that the framework in terms of local views is much less precise, and we would hope that the GLA will have a strong influence to ensure that the local views framework is applied in a proportionate and consistent way across the London area.

Page: [Policy G5 Urban greening](#)

Section: [N/A](#)

We broadly support the objectives underpinning this policy.

We would place a note of caution which stems from our concern that this framework appears rigid and does not provide adequate flexibility to respond to market signals or changes in the evidence base. We would therefore encourage the inclusion of a mechanism which gives the LPA more flexibility in terms of the approach which can be found acceptable in these respects.

Page: [Policy G7 Trees and woodlands](#)

Section: [N/A](#)

We broadly support the objectives and approach for policy G7.

We would agree that developers should seek to retain quality trees where that is practicable and that in the event of their loss they should be appropriately replaced. There are a number of methodologies to assess the relative value of street trees and we do not seek to support specific methodologies which may of course be superseded over the life of the Plan period.

Scheme designers will need to test the effect of retention on their schemes and that should be weighed up as part of the design approach in discussion with the LPA at an early stage.

Page: [Policy SI1 Improving air quality](#)

Section: [N/A](#)

We object to the concept that development which triggers the EIA thresholds should be required to adopt and achieve an Air Quality Positive approach. That is fundamentally discordant with the requirements of the NPPF and does not appear to be evidence based.

It is appropriate to require applicants to minimise adverse impacts, but to ask them to "improve" from the existing situation is in conflict with well established principles or indeed the "agent of change" approach which is being advocated.

Page: [Policy T6 Car parking](#)

Section: [N/A](#)

In the context of mixed use developments, there will be a need to recognise that the parking resource can meet the needs of different users at different times of the day.

In highly accessible locations, it would ideally be encouraged that users of the site would typically choose non-car modes because they have the choice and opportunity to use public transport for many of their journey requirements.

In some instances, office users can (even in relatively accessible locations) demand on-site parking in much the same way as they would if located at a satellite location. There is therefore a challenge to encourage office occupiers to take space in highly accessible locations and (over time) recognise that their staff do not need a large supply of parking. However, to impose substantial restrictions on parking supply for office uses on a blanket basis (even in PTAL5 locations) might well impede the ability to secure occupiers in the more marginal locations in the Outer London area.

We therefore encourage a flexible and pragmatic approach to the implementation of this policy and the weight to be afforded to it.

Page: [Policy T6.2 Office parking](#)

Section: [N/A](#)

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We therefore encourage a flexible and pragmatic approach to the implementation of this policy and the weight to be afforded to it.

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

Section: [N/A](#)

We broadly support the objectives set out by Policy DF1.

Through various policy aspirations, targets are set in terms of environmental performance (such as BREEAM) and affordable housing such that the viability of mixed use development including employment is extremely challenging- especially in locations where market conditions dictate that the levels of return will be markedly lower than in the prime pitch areas.

We would encourage that positive weight should be afforded to mixed use schemes delivering employment in marginal locations, and that there should be a recognition that this will result in viability challenges in terms of delivery against the full range of policy requirements.

The viability challenge could be reduced by agreement to a higher density solution but this will also need to be assessed against other design objectives.