

Draft London Plan Revo's Response

Section A: Who we are?

1. Revo is the organisation that supports businesses in the retail property and placemaking sector. Our unique community includes private and publicly listed retailers and owners of retail property, as well as local councils, and advisors and consultants of all sizes who provide services to our industry.
2. Retail generates approximately £20 billion in taxes and contributes 5% of the UK's total Gross Value Added (GVA) annually. Retail property is the largest asset class in commercial property valued at £360 billion. Well over 3 million people from apprentice to Board Director are directly employed across all corners of the country in retail and retail property.
3. Our members and the wider retail property and placemaking community are keen to create places people wish to live, work and enjoy their leisure time in, and are keen to work with government to deliver our shared objectives and overcome barriers to create and successful places and meet the needs of our communities.
4. Our members have vast experience in urban regeneration and placemaking, with many having been specifically involved in London schemes from planning right through to delivery.

Section B: Background

5. We welcome the Mayor's publication of the draft London Plan and recognise the need to ensure there is a clear and visionary plan to deliver for the future of London - streamlining planning, protecting and enhancing retail and leisure, and improving housing supply and delivery, underpinned by modern infrastructure and progressive environmental policies.
6. Revo is uniquely placed to assist the Mayor's Office in the consideration of these types of placemaking issues as the leading retail property and placemaking organisation in the UK. The focus upon place and placemaking is integral to the successful implementation of this Plan.
7. Issues intrinsically linked to our sector's success include building and creating sustainable communities and places where people wish to live, work and play. The successful delivery of a visionary plan for the capital, supported by services, infrastructure and connectivity create place and support long term sustainable value both in London and across the UK, where the Plan will often be used as a reference and benchmark.
8. We believe access, inclusivity and diversity should be at the heart of business and employment practices in the UK and sits at the core of our retail placemaking philosophy. This is key to creating an inclusive society that works for everyone.
9. By way of caveat, we have not responded to all of the policies in the Draft London Plan, but only those to which we are strategically placed to comment or are relevant to our membership - and we would not necessarily implicitly support all policies to which we have chosen not to take a position or directly respond.

Section C: Response to the draft London Plan

General Comments on Retail, Hospitality and Leisure Development

10. Our high streets, town centres and retail places offer great potential to create new opportunities for a wider range of uses that we believe merit more detailed consideration by the Mayor in its plan for boosting UK retail, housing supply, and when considering policy matters more generally in the future.
11. Retail-led regeneration has the ability to be transformational (such as at Stratford) and must be considered more highly by the Mayor – not just in the CAZ retail clusters and specialist shopping destinations – and in the Plan more broadly, if we want our urban centres to be vibrant today, tomorrow, and into the future.
12. While we are supportive of many of the measures in the Plan, there are questions over implementation, a reliance on central Government funding and there is limited response to retail – in its broadest sense – and its role in the future of London. This comes at a time of rapid change, an evolving market and is not underpinned by any incentives to encourage developers to build.
13. Revo is keen to work with Mayor's Office to share its perspective and expertise and to ensure the full potential of the development and investment activities of our members can be harnessed as part of the wider debate on retail-led regeneration and placemaking.
14. Changing shopping habits and in particular internet retailing means our town and city centres need to be more pro-active in preparing strategies for growth (or possibly managed decline and re-orientation) and creating the right environments to attract people to visit and stay longer. This includes creating more attractive places with a wider mixture of uses - including housing - which reinforces traditional town centre uses.
15. We support the Plan's town centre first approach for retail, leisure and entertainment, whilst noting that there is a place in the market for existing out-of-town developments and retail parks, and where appropriate, new schemes based on relevant sequential and impact assessments. We also support diversification of use such as residential on edge and out-of-town developments where these locations are accessible.
16. We agree that there is no single solution to good placemaking, and each centre should be considered on its own merit, but in relation to its position in the wider strategic network. We believe that the key issues of retail-led regeneration, transport and infrastructure warrant further consideration in the Plan. There are also policies which on occasion appear to be contradictory in their objectives which require further clarity to bring forward good development. This must be supported by effective and proper resourcing if we are to meet the high ambition set out in the draft Plan.

CAZ retail & capacity

17. Our research shows that 85% of sales still touch a physical store – through research, showrooming, click and collect – and that physical retail still serves the majority of sales even through there has been greater growth (by percentage) in online sales. Store formats continue to evolve and high streets need to evolve to support and accommodate new businesses, innovative models and sufficient servicing / logistics.
18. The Plan rightly identifies that projected spend is expected to continue to grow in the UK and therefore we continue to support the need for new floorspace where relevant, such as in the CAZ projection of demand for comparison goods up to 2041 (375,000 sq m). We are also supportive of Special Policy Areas which define local specialisms that might otherwise be at risk (e.g. Savile Row tailoring, Denmark Street musical instruments) that create London's unique and diverse tapestry and supports good, holistic placemaking.
19. We support managed growth, and where necessary managed decline, of retail and support diversification of floorspace and increase in new and innovative footfall drivers, however core retail must not be sacrificed, nor the services they provide which enhance communities. Therefore, we fully support strategies and policies that encourage a mix of use whilst protecting essential and core retail which must not be lost to other uses via Permitted Development Rights.

20. We are exceptionally well placed as an organisation to advise on the trends and changes in the retail and retail property market, food and beverage and leisure operation, and we would encourage the Mayor and Local Authorities to engage with Revo and our membership to meet the challenge ahead.

Planning London's Future (Good Growth Policies)

Building strong and inclusive communities (GG1)

21. We welcome the Mayor's emphasis on the crucial role town centres play in the social, civic, cultural and economic lives of London, highlighted in GG1(D). Successful high streets and town centres are a vital social centre for communities and require support at a time of challenging markets, the rise of online and political uncertainty. If properly invested and curated, they can be the engine for economic growth through the empowerment of businesses and bring life to new locations and vibrant local economies – both daytime and night time economies.
22. There is no single solution to good placemaking, however the recognition of the importance of place, and its role in facilitating social interaction is to be applauded. New buildings, and indeed regeneration, can fundamentally change the dynamic and offering of a place, and its value socially and economically.

Making the best use of land (GG2)

23. We are encouraged by the commitment to creating high-density, mixed-use places that make the best use of land, which is at a premium in cities such as London, and recognise the need to progress or repurpose brownfield sites – however conversations around ensuring economic viability are required in order to bring forward more successful development.
24. The policy's emphasis (GG2(A)) on the need to prioritise the development of opportunity areas and brownfield land and maximise the potential of sites around transport hubs and in town centres is also welcome. Examples such as Kings Cross epitomise the catalytic ability of transport hubs and infrastructure investment to wider mixed-use placemaking, and the creation of a thriving local community where people can live, work, and play.
25. If London is to meet its requirements for new development (such housing), at the rate required, there is a need for a land use strategy that embraces all possible sources of land – which likely includes the need for greenfield sites as well as the conversion of existing brownfield sites. This includes bringing forward to market public land which has been identified as surplus – such as by TfL and public land identified by the London Land Commission.
26. We also acknowledge the scope for higher-density housing in urban locations that are already well served by public transport (such as around railway stations), as highlighted by GG2(B); that provide scope to replace or build over low-density uses (such as retail warehouses, lock-ups and car parks); or where buildings can be extended upwards by using the 'air space' above them – which we would welcome.
27. However, thriving places require balance and diversity. We support the approach of protecting existing businesses that wish to continue to thrive or grow but could be adversely affected or restricted by new development (residential, for example, squeezing out live music venues / hospitality). A careful balance must be found to solve the density shortfall but ensure local businesses that give character and life to our distinct communities are not negatively impacted.

Creating a Healthy City (GG3)

28. Entrenching health and wellbeing as a key outcome for the city's continued growth is welcome and we agree it is an integral part of creating sustainable places and thriving community. This should include accessibility and inclusivity as a thread, and we support a further focus on the social value of the built environment and its contribution to London society in the widest possible sense.
29. Further detail is needed on how the Mayor plans to implement and support this approach in future policy and must be done in partnership with other key stakeholders. We would also envisage this joined-up approach with key stakeholders across the spectrum in both the public and private sectors would be

required to achieve these goals. They cannot be achieved by any one sector alone nor should overall responsibility be placed on one sector given communities stretch beyond the parameters of the buildings in which people live, work, and play.

30. This joined-up approach should also reach across Borough boundaries to have maximum impact and local authorities should be encouraged to work together to leverage positive investment, and this should also be reflected in their engagement with development partners.
31. Further clarity is sought on how a 'Healthy Streets Approach' to prioritise health in all planning decisions (GG3(C)) would be applied and any policy test which must be met (and the criteria for such) to ensure the potential impacts of this initiative on the logistical and financial viability of development proposals is right and just.
32. We agree with other industry bodies that there remains a discord between the aspirations of the GLA and many local authorities (particularly Outer London boroughs) when it comes to reducing car use and ownership and we would therefore encourage whether greater guidance and / or evaluation can be provided in this regard.
33. We support improved access to green space and public realm as a central aspect of creating a healthy, vibrant city.

Delivering the homes that Londoners need (GG4)

34. We agree that the issue of housing remains at the top of the Mayor's agenda and his commitment to increasing housing supply in London is welcome, and facilitates footfall, job creation and sustainable community – but we would also argue that good housing does not exist in a vacuum. The Mayor's target of 66,000 net new homes a year (up to 2030) is ambitious and using all the tools and innovative solutions available will be needed to achieve these targets.
35. Revo believes we have much to offer in assisting the Mayor's Office in understanding the potential of urban locations, such as town centres and edge-of-centre and out-of-centre retail locations to contribute to increasing housing supply; and, most importantly, balancing this against the wider needs of communities in terms of access to retail and leisure facilities and the demand for employment space, and the need to protect and plan for some uses that might be incompatible with housing uses.
36. The draft Plan is, however, a positive step to providing Londoners with decent and affordable homes to live in and provides a good framework to help delivery. It is important to see that the delivery of homes is not seen as independent from the places where they are built, and that good and well-designed quality accommodation can hugely contribute to a sense of community and place – and we support the Plan's recognition of this.
37. While issuing housing challenges to the boroughs, policy-making must still be approached in a joined-up way, and across borough / political delineations which do not exist in the minds of users / consumers, so that town centres thrive, encourage diversity of retail and commercial uses and more effectively integrate housing in the way that people use the places they live.
38. We support achieving higher density development in urban locations (including in and around town centres and in other retail locations) whilst recognising this creates many challenges, and ones that many of Revo's members are very familiar with. Further investigation should also be given to viability and land assembly issues which often stand in the way or significantly delay realising latent potential.
39. As previously acknowledged, town centre and brownfield regeneration remains inherently challenging. We believe the Mayor's Office should encourage a more flexible approach to affordable housing, both in terms of overall quantum and affordable housing tenure – particularly in light of the ambition to have 50% affordable housing delivery on public sector portfolios (H5(A)(4)) irrespective of the type of site and place in its wider context; moreover, the definition of public sector land highlighted at para 4.6.5 (*land that is owned or in use by a public sector organisation, or company or organisation in public ownership, or land that has been released from public ownership and on which housing development is proposed*) could be particularly burdensome for developers who wish to develop sites previously owned by public bodies, as the need to ensure Local Authorities achieve the best value for their sites, combined with the Mayoral request for 50% affordable housing, could detrimentally hinder the viability of such schemes.

40. We have also previously advocated for a policy which is clear that Affordable Private Rented (APR) homes are an acceptable form of affordable housing tenure, as part of Build To Rent (BTR) schemes which the Government has set out its intention to do. We believe this will ultimately allow developers and landowners to bring forward sites in hitherto unviable locations and increase the supply of affordable homes in good quality locations in London's boroughs.

Growing a Good Economy (GG5)

41. The commitment to supporting the delivery of wider public benefits, diversification and more equitable success is welcome. There is strong evidence to suggest that small scale infrastructure and transport connections enable the growth of, and investment in, strong economies – and in the case of London, for all local communities to maximise their economic potential, better public transport links from central London to developing urban, suburban and rural areas in greater London and the commuter belt are required – particularly in light of the aims and needs of becoming a truly 24-hour city
42. We support protections for London's rich heritage and cultural assets, which also create unique and diverse places and generate economic activity in of themselves across education, tourism and innovative regeneration. These buildings can act as assets or focal points for new developments – as epitomized by the Highbury stadium redevelopment or repurposing of London Olympic legacy buildings for example.

Increasing efficiency and resilience (GG6)

43. We support efforts across the economy to increase efficiency and resilience in the built environment as part of strategic planning and crucial to success. We also support the ambition to be a zero carbon city by 2050 highlighted in GG6(A).
44. Our industry has already taken great steps to improve energy efficiency, water usage and carbon impact and continues to do so and help to build a more sustainable future from construction through to management of building performance, and change of use throughout the lifetime of our ever evolving built environment.
45. We have concerns however in regards the 15% energy efficiency targets for non-domestic buildings (Policy SI2(C)), and question whether this target is achievable and rigorously tested by the Plan's viability study.
46. We support efforts to ensure London's safety and resilience in relation to emergencies, natural disaster, climate change and fire safety. However, we recommend that both national government and the GLA ensure that security provisions and initiatives are employed consistently and properly at a local level.

Spatial Development Patterns

Collaboration in the Wider South East (SD2)

47. More effective co-operation between the Mayor and the Wider South East (WSE) local authorities is essential for holistic placemaking – particularly given the economic and regional draw of the capital. The draft Plan correctly recognises the effects of London's housing and labour markets (and their related multiplier effects) extend far beyond the capital's official administrative boundaries, making co-operation and collaboration a clear necessity, particularly when trying to unlock housing. The support Mayor's aim to work with the WSE to find solutions to 'shared strategic concerns' appears to be a step in the right direction.
48. The Plan states that relationships with neighbouring authorities will continue to be managed through a 'non-statutory strategic structure' with the Mayor interested in working with 'willing' partners beyond London – incentives from central Government to put this on a stronger footing or a more formalised structure may be required in future.

Central Activities Zone [CAZ] (SD4), Growth Corridors and Opportunity Areas (SD1)

49. The recognition of the need to plan for growth in different locations within the city through the revised approach to Opportunity Areas, the acknowledgment of the CAZ and the introduction of growth corridors based on existing and planned infrastructure are welcome. However, more guidance is needed in terms of what should be built or delivered at particular locations and several Opportunity Areas are predicated on major infrastructure going forwards not all of which has yet been greenlit and requires additional funding from Government – notably Crossrail 2.

Town centres (SD6), Town Centre Network (SD7) and Town Centres: Development principles and Development plan documents (SD8)

50. We fully support a town centre place making policy approach that is sustainable, connected and adaptable to the changing nature of the high street.
51. It is important the Plan recognises the changing role of town centres and the pressure that the rise of omnichannel retail has placed on their ability to function in their traditional retail-based format, therefore we are encouraged by the Plan's commitment to adapt, including innovative ways of retailing, accommodating new space where there is a demand, managing the transition of surplus retail space to other uses such as intensive mixed-use and residential, and supporting flexibility for temporary or 'meanwhile' uses of vacant properties.
52. We continue to support higher density and new homes above retail and commercial use, which in turn make footfall more resilient and offer services to those residents. We agree that town centres with new housing developments must be well-connected to public transport infrastructure and the local economy.
53. Policy provisions should give flexibility for local authorities to plan town centres to make best use of space and facilities, to create sustainable locations with active day and night time economies. As with the last 20 years, there has been significant change and it is clear that the next 20 years will bring further change to which our centres must be able to adapt.
54. Business rates, property taxes and overall occupancy costs are currently putting extreme pressure on the viability of physical retail unlike at any time previously, coupled with the challenge of online retail. The Mayor must consider how to best capture and deliver value to ensure we have successful high streets and town centres which we agree are vital social centres for communities. This must include new and innovative ways to ensure that retail, amenities, offices, leisure, entertainment, culture, tourism and hotel industries are supported and encouraged to remain / locate on the high street if our centres are to remain vibrant. We believe retail, hospitality and leisure are critical components of successful mixed-use developments, particularly in the experience economy in which we currently live.
55. The managed growth, and where necessary decline, and consideration of outdated Use Class Orders must also be considered to ensure innovative start-ups and hybrid businesses can thrive in the capital and to ensure vacancy rates remain as low as possible to create stronger, more resilient town centres.
56. Local authorities, communities and businesses remain at the heart of this process, and must work in concert, while Local Authorities in particular should consider how public services can be used to help protect the vibrancy and footfall of key economic centres (e.g. health services, community sports facilities, etc).

Town Centres: Local Partnerships and Implementation (SD9)

57. We support the Plan's efforts to bring further collaboration between the public and private sectors to leverage expertise and engage relevant stakeholders, particularly where there is a skills deficit due to the limited resources available to Local Authorities and to ensure community input.
58. We also support the call for Boroughs to consider the mechanisms by which they deliver mixed-use development and ongoing asset management, including investment models where our sector has significant expertise.

Strategic and local regeneration (SD10)

59. We welcome the continuity in policy to encourage spatial planning at a local level and support the call for all stakeholders to operate in a collaborative way, through pooling resources and creating partnerships.
60. The Mayor's Office has significant convening power to bring together the private sector and Local Authorities and we would encourage the Mayor to do so, to create positive partnerships and understanding between all parts of the market.
61. We support the identification of Strategic Areas for Regeneration through utilising Local Authorities data and understanding of local need and demographics, however we have concerns as to whether many Local Authorities have sufficient resources to do so, and they must be supported by the Mayor's Office to ensure the ambitious growth agenda is met. Our industry has expertise to assist and we are ready to assist in delivering positive outcomes for regeneration.

Design

Inclusive Design (D3)

62. We fully support the Mayor's proposed policy for encouraging inclusive design across London's built environment. Ensuring that new retail, homes, and other property types meet the needs of all is critical ensuring that growth is delivered equitably and sustainably. We have already released an Accessible Places Toolkit and work closely with the Government's Disability Sector champions to expand and reach our ambitions and build stronger communities.

Public Realm (D7)

63. We fully support the Mayor's draft policy for helping to ensure that the city's public realm contributes to sustainable growth and to the wellbeing of its inhabitants. We encourage Local Authorities, the GLA and the private sector to work in collaboration to achieve their common goals through available vehicles such as business fora, BIDs and other mechanisms and to ensure effective dialogue with local stakeholders and build cohesive environments.

Safety, Security and Resilience to emergency (D10) and Fire Safety (D11)

64. We support the Mayor's intentions to convene partners to ensure a safe and secure environment in London, and protect against emergencies such as fire, flood, weather, terrorism and related hazards. Learnings should also be shared across boroughs from recent security experiences as well as ensuring good practice is delivered in public spaces across the city, particularly where public and private developments meet or in high risk areas.
65. We fully support efforts to achieve the highest possible standards of fire safety for new buildings in London. Recent events speak to the urgency of this issue and we look forward to working with the Mayor and central Government on building regulations and safety.
66. However, we agree with other industry bodies that there is a need for clarification in terms of a precise understanding of what is considered to be the 'highest fire safety standards' as technology and our understanding continues to evolve, and how this applies to various sectors and property types based on their scale or function (commercial, residential, mixed-use et al). We look forward to more detail in due course.

Housing

Increasing housing supply (H1)

67. As aforementioned in Good Growth policies, we support the ambitions to deliver 66,000 additional homes per annum in the capital and the allocation of individual housing targets to each of the London boroughs, and that a number of ways should be taken to achieve this increase as well as the factors that London's boroughs should take into account.

68. In addition to earlier commentary, residential is still not identified as a 'main town centre' use and we believe there are situations where housing may be appropriate given the changing nature of urban centres, but that core retail and services must be sufficiently protected. Meeting the provision of housing in our town centres will not only assist in addressing the housing shortage and chronic undersupply but – where appropriate – help tackle the oversupply of retail in some areas where there is excess floorspace.
69. As well as increasing housing stock, town centre residential can provide accommodation for employees working in the respective centre, for example, alleviating the need for commuting and easing pressure on already overburdened infrastructure. This is even more important where complicated sites and projects are concerned e.g. in town centre and urban locations where assembling land and formulating viable mixed-use schemes, including residential, represent significant challenges.
70. Additionally, the Mayor's allocation of housing targets seemingly does not relate to the Government's new proposed standardised methodology for assessing objectively assessed need (OAN). It is also not clear from the draft policy what the Mayor is proposing to ensure there are measures in place that would come into play to address under-achievement of a Borough's housing requirements, and how the Housing Delivery Test would apply once it has been introduced nationally.
71. We would be supportive of 'meanwhile use' as a practical approach to encourage temporary use of sites for housing, mindful of the considerations set out in the policy.
72. We believe there should be recognition that in delivering affordable housing (policy H5) of the frequently competing needs and occasional tension of planning obligations that developers face – not only via s106 obligations but via Mayoral and local community infrastructure levy (CIL). The decision as to whether the development will qualify for the threshold approach route will sometimes not be one that the developer is able to make, if there are significant other planning obligations and CIL payments.
73. Greater emphasis could also be made in the policy on how developers and local authorities should prioritise the Plan's policy obligations after CIL and explain the other options that can be considered for enhancing scheme viability e.g. via the funding of necessary infrastructure (e.g. via public funding, tax increment finance, etc), so as to ensure the maximum affordable housing can be delivered.

Monitoring housing targets (H3) / Delivering affordable housing (H5)

74. We support the policies of monitoring housing targets and delivering affordable housing. As well as meeting and assessing targets, benefits include the creation of a database of evidence which produces useful insight into the market, trends, and where further efforts should be focused in future.

Redevelopment of existing housing and estate regeneration (H10)

75. We support efforts to ensure housing stock is not lost and should only be replaced at the equivalent or a higher density, unless there are exceptional circumstances.

Social Infrastructure

Developing London's social infrastructure (S1)

76. We recognize the importance of social infrastructure in developing strong and inclusive communities and enhancing quality of life. We support policies to ensure that new developments have their social infrastructure needs met, and that they are facilitated by easily accessible transport links, but must be carefully considered in regards major developments. It also requires an understanding of what and how services are provided, and by whom, to meet the needs of both the existing and new community and the impact on the existing community.

Public toilets (S6)

77. We support the policy proposal that large-scale commercial developments, such as shopping centres, leisure facilities and large areas of public realm, should provide and secure the future management of free publicly-accessible toilets. We also agree that facilities should be suitable for all who use them, including disabled people and families with young children. Ensuring that public places have such facilities will help

maintain an area's vibrancy, as it will give everyone the confidence to move around the area and dwell in these large-scale commercial developments.

78. Local Authorities have a critical role to play where there is fractured ownership in an identifiable area where such services maybe required (e.g. high streets) but not mandated by virtue of the smaller buildings and businesses that occupy them but could not / would not be able to afford them alone. We would also once again signpost to our Accessible Places Toolkit.

Heritage and Culture

Supporting the night-time economy (HC6)

79. We support the Mayor's development of a vision for the night time economy of London. Successful cities need a vibrant mix of activities and the further promotion of night-time economic activities such as eating, drinking, entertainment, shopping and spectator sports will increase London's productivity, economic growth and social wellbeing, alongside the aforementioned commitment to promoting London as a 24-hour global city with the recently introduced Night Tube to unlock new growth.

Green Infrastructure and Natural Environment

Green infrastructure (G1)

80. We welcome a comprehensive focus on green infrastructure, sustainability, and associated environmental best practice within the draft Plan. It should be noted that not all development sites and property types / tenures can fully facilitate the integrated approach. This should not necessarily be a catch-all policy but should be encouraged in the most appropriate circumstances and locations, with provision considered for each proposed development.

Green Belt (G2)

81. Revo supports a brownfield first approach, however in light of London's continued growth, a strategic review of Green Belt policy should be considered and we would support an independent review to explore making better use of the Green Belt, or explore innovative measures such as land swap (given that some Green Belt isn't entirely of high environmental quality). There should also be further conversation and possible incentives around the redevelopment of brownfield sites by Local Authorities to aid in preparation of sites or similarly to make them economically viable for private sector development.
82. Similar principles of national Green Belt policy apply to Metropolitan Open Land (MOL) which could also be subjected to a review of its role and how it could potentially contribute to helping meet London's acute needs. However, Policy G2 as is currently drafted does not seem in conformity with National Policy, particularly with regard to the NPPF's 'very special circumstances' (for inappropriate development, Part A(1)) and 'exceptional circumstance' (for boundaries amendments, Part B) which are not considered/mentioned in the policy text; the accompanying text at 8.2.1 creates further confusion as it refers to the NPPF para 79-92 as these provide 'a clear direction for the management of development within the Green Belt and sets out the processes and considerations for defining Green Belt boundaries'; we suggest revision of the policy text to provide clarity on this point.

Urban Greening (G5)

83. The protection and enhancement of London's green and open spaces is welcome, and it is acknowledged that a good level of provision and a variety of space is crucial to facilitating great places in which people want to live, work and play. The consideration of green infrastructure and how green spaces can add value to the development of an area is crucial. There must be a necessary shift in the densities deliverable and the best use of suitable development sites to meet need to ensure this protection and reach greening targets. We do not believe that the possible outcomes of draft urban greening policy have as yet been fully considered – these seem difficult to achieve for all sites (notably CAZ / inner London).

Sustainable Infrastructure

Improving air quality (SI1)

84. We acknowledge the built environment has a role to play in minimising and mitigating the impacts of development on air quality alongside other sectors and the particular challenges facing London, and our members are already playing a part. A general requirement for development to be Air Quality Neutral is welcome and ensures a reasonable target to work towards.

Minimising Greenhouse gas emissions (SI2)

85. We support aims to help London become a zero-carbon city by 2050 and note the extension of this target to major non-residential developments. This is again an ambitious target and further clarification is needed with regard to the inclusion of construction emissions in the zero-carbon definition. Further, owing to lifecycle carbon assessment methodologies being incomplete, we believe that the targets would be premature without a suitable methodology in place.
86. Targets of 15% non-residential respectively regulated emissions reduction through energy efficiency measures have also elicited concern. The 15% target for non-residential developments is seen to be particularly challenging and guidance should be published on how best to achieve this through existing energy efficiency measures and new methods that are currently available, if it is indeed possible. We do not believe all building types will be able to meet the target and that due consideration should be given to this in planning terms.
87. Whilst the general targets for the reduction of on-site emissions are supported, we have some concerns over the language and methodology used in the definition of zero carbon buildings. We support industry requests for confirmation that emissions related to embodied carbon, construction activities, and unregulated consumption are not included in the zero-carbon definition.
88. It is also unclear what would satisfy the requirement for development proposals to exhibit how they have been future-proofed to achieve zero-carbon on-site emissions by 2050. Evolving regulation and technology also poses difficulties for future-proofing.

Digital Connectivity Infrastructure (SI6)

89. We are pleased that the Mayor recognises the provision of digital infrastructure as fundamental for the proper functioning of development and are encouraged by his plans to achieve greater digital connectivity and ensure that sufficient space is available for future digital connectivity infrastructure.
90. We have long called for better, faster digital connectivity and know that this is an attractive feature for businesses and retailers looking to invest or expand into the UK from our own research. To ensure that London has world-class digital infrastructure, Government should pursue full fibre rollout as soon as possible. Installing fibre at the earliest opportunity reduces the risk of the building becoming obsolete as modern businesses require the speed and reliability of commercial fibre to be productive in the modern economy.

Reducing waste and supporting the circular economy (SI7)

91. We support the reduction of waste and supporting the circular economy and other sustainability initiatives, although we share concerns over how these targets will ultimately be achieved across the breadth of our sector from construction, through life to demolition, and look forward to further guidance on how best to do so.

Transport

Strategic Approach to Transport (T1)

92. We welcome a strategic approach to transport which makes the most efficient use of land and existing public transport provision. It is critical that development takes into consideration what transport infrastructure is already in place and integrates this into its future plans to ensure that growth is sustainable, integrated, and any negative impact on local communities is mitigated. Particularly given

consumers increasingly rarely see the distinction in ownership et al since the introduction and expansion of the Oyster scheme for example, and growing seamlessness of contactless payments and technology advancements.

93. The Mayor's Office must continue to invest in a modern public transport system, including the tube and the bus network, that is fit for purpose but remains affordable to all those wishing to use it. There must also be sufficient capacity to account for expected population growth (including working with the WSE).

Healthy Streets (T2)

94. We believe that healthy streets can only be achieved through a multitude of factors in combination including reduced car use, better and improved transport provision and good, safe public realm – and how that fits into the wider strategic transport network. Good planning and design will be critical to meet the ambitions of the Plan and, as mentioned previously, Boroughs will need to work across their boundaries to ensure that London is working as a holistic city rather than a disparate set of Boroughs with conflicting aims.
95. We look forward to further guidance on how developments will be judged in regards the planning regime, and how Healthy Streets Indicators will be applied in practice.

Car Parking (T6)

96. We are pleased the Mayor is seeking to make the most efficient use of land, however, we believe there must be adequate public transport infrastructure, and sufficient infrastructure for hybrid, electric, and autonomous vehicles – as supported by central Government – before parking facilities are lost to irrevocable development.
97. We support provisions for disabled access, taxis, coaches, deliveries and servicing, and the commitment to providing parking for future transport services and those that require easy mobility. Accessibility continues to be an important issue, and was a primary driver behind the production of our Accessible Places Toolkit to highlight these issues.
98. Whilst we support the provision of infrastructure for electric or other Ultra-Low Emission vehicles, infrastructure and support must be in place such as capacity in the electricity grid, substation infrastructure and where the burden of cost should fall for the creation and maintenance of this infrastructure and the unintended consequences of a fundamental shift in car use in the coming decades.

Funding the London Plan

99. An ambitious London plan will require significant investment and skills for the policies to take real effect. However, the structure of funding for public projects remains complex. Whilst the mayor controls a variety of funding sources (including business rate retention from 2018) for strategic infrastructure investment, there is still a shortfall and efforts to lobby central Government should continue to provide the necessary funding for major strategic infrastructure projects on which further development can be stimulated.
100. We still believe there are fundamental institutional weaknesses Local Authorities are faces in terms of resources and expertise which must be addressed or reinforced by central funding or support – particularly as authorities begin to wield greater power over their budgets and through London's devolved powers. The Government's own Housing White Paper highlights the particular problem of recruiting and retaining planners and other specialist skills. These problems are acute and very evident in Revo members' dealings with planning departments across the country. These problems are a direct result of the halving of planning departments budgets since 2009/10 in the face of other local budgetary priorities. This in turn causes significant delays in decision-taking and policy-making and unnecessarily deters investment in all sectors of the economy. We continue to make representations to the Government on this issue but the Mayor's Office, within the powers and resources available to it, should assist those boroughs with deficiencies to achieve the vision the London Plan seeks to aspire.
101. Revo also recognises the need to deal with construction skills shortages; and the need to tackle delays caused by planning conditions and to simplify developer contributions. Investment in universities, colleges and technical skills must focus on raising skills and addressing skills shortages. By virtue of their location,



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education and business clusters can also be the focal point around which sustainable development and skilled communities can grow, and other institutions be encouraged to locate. London can help to lead the way for the rest of the UK.

102. We are also ready to work with the Mayor's office to find ways to solve the current skills shortages, and through our Educational Trust have a number of programmes being delivered and in development that improve the skills of current employees, and bring new people into our dynamic and diverse sector. An area of focus for Revo at present is to work to build greater capacity in Local Authorities, support upskilling of local authorities, and empower civic leadership to enable sustainable development in the built environment.

Contact

Please do not hesitate to contact us on any of the points raised above. Please contact:

Matthew Ogg
Policy Advisor

matthew@revocommunity.org

Revo, Charter House, 13-15 Carteret Street, Westminster, SW1H 9DJ