



Sadiq Khan (Mayor of London)  
New London Plan  
GLA City Hall  
London Plan Team  
Post Point 18  
FREEPOST RTJC-XBZZ-GJKZ  
London, SE1 2AA

By Email: [londonplan@london.gov.uk](mailto:londonplan@london.gov.uk)

Date: 01 March 2018

Dear Mayor,

**RE: DRAFT LONDON PLAN CONSULTATION**

Thank you for the opportunity to make representations in relation to the Draft London Plan ('DLP') as published in December 2017. These representations are made by Royal London following review of the DLP in consultation with our advisor CBRE Planning. Royal London is the largest mutual life, pensions and investment company in the UK. Through its Royal London Asset Management (RLAM) arm invest, manage and develop across all major asset classes within the UK. Royal London are particularly active in London, holding and actively acquiring a large and wide-ranging portfolio including office, industrial, retail and residential land/assets.

Royal London have extensive experience of property and land management in London with the planning process and policy framework an essential consideration in the management of these assets. To bring forward development in response to the objective needs identified in the DLP, Royal London require a planning process and policy framework which is timely, ambitious, supportive of growth and flexible in its application.

Royal London welcomes the broad aspirations and ambitions of the DLP including the identified needs within a variety of sectors and the intent to support the provision of this within the new concept of 'Good Growth'. However, it is evident and alarming that whilst the DLP identifies the need for growth, the current detail and requirements of many emerging policies do not facilitate this and will without significant amendment undermine the delivery of these ambitions and objectives.

Attached to this letter is a schedule which provides our detailed comments in relation to emerging policies within the DLP and our suggestions in terms of amendments or removal. The DLP introduces a truly significant number of new and heightened requirements on development which will prevent and render a sizeable proportion of development proposals unviable. The DLP in this regard does not reflect current market conditions or provide a planning policy framework to enable and deliver the development and growth identified. Notable concerns include the prescriptive and inflexible requirements in relation to low cost business space and affordable workspace will be extremely harmful to commercial development and delivering the growth identified in the DLP. In addition,

**ASSET MANAGEMENT**  
55 Gracechurch Street, London EC3V 0RL  
[rlam.co.uk](http://rlam.co.uk)



whilst the provision of affordable housing and the principle of the threshold policy is supported the various levels set do not provide the conditions and reflect the viability position of development to facilitate delivery.

In recent times, the planning process has become unnecessary complex and the requirements on applicants excessive. These requirements at planning stage often do not reflect the stage of design development and the risk and cost associated within this. In addition, our experience is that many technical documents are not reviewed or duplicate regulatory processes and controls later in the development process. To be clear Royal London prepare and submit quality and comprehensive development proposals to allow a full assessment at planning stage. The DLP introduces yet more technical document requirements which are considered unnecessary and counter intuitive to the planning process facilitating development and good growth.

Royal London would welcome engagement with the GLA in relation to the attached representations and emerging policies within the DLP. Royal London trust that these comments are helpful and are fully considered so that a new London Plan can be adopted which provides a document which facilitates the growth needs of London which rather than restricts this.

Royal London would request that they are kept informed of the Draft London Plan process and milestones, including changes to the document following this consultation. Please can Royal London reserve the right for a representative to attend any future DLP Examination in Public.

Yours faithfully,

Head of Development Project Management –  
Property

cc. Matthew Bird, Development Manager -

**ASSET MANAGEMENT**  
55 Gracechurch Street, London EC3V 0RL  
rlam.co.uk

## ROYAL LONDON – DRAFT LONDON PLAN REPRESENTATIONS

POLICY	COMMENTS AND SUGGESTIONS
<b>1. Planning London's Future (Good Growth Policies)</b>	
<u>Policy GG2 – Making the best use of land</u>	<p>Royal London welcome the key intent of this policy to promote the densification and prioritise the development of Opportunity Areas (OA's), brownfield land and surplus public-sector land.</p> <p>The delivery of new and improved infrastructure to and within these areas to create the context and market conditions to support and facilitate development is key. We would emphasise the importance and responsibility of the GLA and its partners in ensuring the delivery of this identified infrastructure to enable and optimise development potential. An example this would be the importance of the delivery of the Bakerloo Line Extension into the Old Kent Road Opportunity Area which will facilitate the development of RLs assets in these areas. Funding for this needs to be resolved at a strategic, national and regional level with the GLA having the lead responsibility to achieve this.</p> <p>RL notes and welcomes the clarification within the Draft Plan that a design led approach to intensifying the use of land should be followed. However, RL would stress and strongly recommend that the GLA provides clarification in their approach that a design led approach does not simply mean just following the surrounding scale, heights and massing of building heights but also thinking about the future and emerging potential and context of an area. The identified growth needs of London as clearly set out in the Draft Plan should be an essential, explicit and legitimate consideration in assessing proposals which seek to intensify the use of land to avoid 'more of the same' proposals and local level decision making which fail to optimise the use of sites. We would also recommend on this theme that there is an explicit recognition within this policy that sites of significant scale often provide an opportunity to provide definition, character and context to an area themselves and these sites certainly should not be undermined by a cautious approach and application of a design led approach to planning.</p>
<u>Policy GG3 – Creating a healthy city</u>	<p>RL are supportive of the objectives of this policy, however we are concerned in relation to the potential request and presumed responsibility for applicants to provide Health Impact Assessments in support of development proposals. Any planning application submitted includes a range of technical documents covering a range of clear and understood topics and key development considerations depending on the scale of development proposed. RL understand and take this responsibility to clearly and comprehensively present their proposals seriously.</p> <p>In recent times however, the number of documents required at the planning stage has exponentially grown and in many cases rather than benefiting the planning process these simply introduce a level of complexity and cost which is unhelpful and unnecessary. It is our repeated experience that such technical documents are often not read or reviewed following submission with conditions often attached to permissions which repeat a requirement for the information provided at application stage within these documents.</p> <p>We would suggest that officers and decision makers should be able to assess an application in relation to this topic through reviewing the extensive application documentation already required. The London Plan is a strategic document and therefore a potential prescriptive requirement to provide a poorly defined document is unhelpful and together with other requirements can be seen to overburden applicants and make the planning process unduly complicated and costly when advancing proposals at risk.</p>
<b>2. Spatial Development Patterns</b>	
<u>Policy SD1 – Opportunity Areas</u>	<p>RL welcomes and are supportive of the aspirations of the policy to support growth within these locations. We would however comment that the wording of the policies needs to be more explicit in the requirements/expectations of boroughs in decision making process and also provide greater scope/ clarification of the role of the GLA where the objectives of these policies are not being delivered. Key comments/suggestions include:</p> <ul style="list-style-type: none"> <li>• Part B to read 'Boroughs, through Development Plans and decisions, <u>must</u> (replacing 'should').</li> <li>• Inclusion of a stipulation that GLA will use powers including direct decision-making powers where boroughs are not in their decision making, planning advice and/or planning policy documents in accordance and demonstrating delivery of the objectives of this policy.</li> </ul> <p>Contrary to the current wording of the policy and guidance of supporting text paragraph 2.1.4 we would recommend that there needs to be clarification and clear responsibility on the preparation of planning frameworks for these areas to provide the certainty and conditions to allow development to come forward and optimise the potential of these areas. Clearly the GLA is able to take a strategic approach to these locations and we would advocate that the responsibility to introduce, lead and approve these documents should sit with the GLA to avoid the often encountered situation of local level guidance (often not subject to independent examination) unduly stifling the planning process and potential of development sites. The inclusion of landowners within this process is key and should be explicitly stated within the policy.</p>
<u>Policy SD4 – The Central Activities Zone</u>	<p>RL are supportive of the overall objectives of the specific spatial policy for the Central Activities Zone. RL have a number of assets within the CAZ and welcome the policies which recognise the importance of supporting and enhancing the nationally and internationally important office functions of the CAZ.</p> <p>In recognition of the importance and opportunity of the CAZ we advise that the policy should include a more positive statement regarding development intensification and optimisation within this area given its excellent accessibility. It is noted that draft policy D6 provides a clear requirement in relation to residential development that this must make the most efficient use of land and to be developed to optimum density for all uses. We request that a similar requirement is introduced within policy SD4 requiring development in the CAZ to optimise density and make the best use of land. The current wording within SD4 part B seeking 'intensification' is insufficient in this regard and simply relates to office development.</p>
<u>Policy SD5 Office, other Strategic Functions and Residential Development in the CAZ.</u>	<p>RL strongly welcome the recognition and importance given to office and other CAZ strategic functions and the identification that greater weight in identified areas will be given to these uses than residential accommodation.</p>

	<p>It is the repeated experience of RL that 'mixed use' policies at a local level are applied with limited flexibility and consideration to the specifics of the site, the overall quality of the scheme and the developments viability. The rigid application of mixed use policies at a local level seeking alternative uses (chiefly residential onsite) as part of commercial schemes (strategic function) results in many cases to less efficient developments which undermines the quality of the development and floorspace provided. The inflexible application of mixed use policies on often constrained Central London sites introduces significant cost, complexity and risk to the development process undermining the confidence that we and others can have in the planning process and consequently posing a real threat to delivery. There is often no consideration of whether residential housing is appropriate in a specific location and marketable as part of a mixed use scheme. In addition, the development of a mixed use building in many cases has a significant adverse impact on the value and attractiveness of the commercial space provided and the new tenant profile leading to potentially lower rents and longer voids impacting on the overall viability of the scheme and the vitality/economic function of the area.</p> <p>RL supports the removal of a mixed-use policy at a strategic level but consider that greater clarification/certainty is required within the policy. We would advise that there needs to be first a recognition in the wording of policy SD5G that the appropriateness of mixed use development (housing alongside office development) should first be considered (from a practical, overall development quality and viability perspective). At a very minimum we would request that the wording of policy (SD5i) is amended so that local approaches will allow land use swaps, credits and off-site contributions (all subject to viability) as an acceptable response to these mixed use requirements rather than the current wording which is unduly ambiguous and is likely to be ignored at a local level. RL have extensive recent experience of bringing development forward within both the City of Westminster and London Borough of Camden where local mixed-use policies are adopted.</p>
<b><u>Policy SD8 – Town Centres: development principles and Development Plan documents</u></b>	<p>RL welcome and support the key objectives of this policy and currently hold a number of retail parks including within the London Borough of Hammersmith and Fulham; and Lewisham which are currently under development or could in the future align with the objectives of this policy to support higher density development intensifying the use land and bringing forward residential housing.</p> <p>In relation to retail uses more generally it must be recognised that the retail and consumer market is dynamic and rapidly changing and we would therefore advise against unduly prescriptive policies on this matter. For instance, 'no net loss of retail or leisure' floorspace is inappropriate.</p>
<b>3. Design</b>	
<b><u>Policy D1 – London's form and characteristics</u></b>	<p>RL are generally supportive of good design principles and the requirement of the policy to use land efficiently by optimising density amongst other considerations. However, we consider that the policy would benefit from amendments to provide more explicit reference and include the future character and potential of an area and the clear growth needs for all sectors established in the plan as a legitimate design considerations, alongside matters such as heritage for instance.</p> <p>Such amendments are necessary to ensure that this key design policy is 'stitched' together with the rest of the Draft Plan. The current wording within part D1(B1) makes limited and insufficient reference to emerging street hierarchy as a design consideration where something more bold and defined is required to ensure that a positive approach to intensification and growth is established in assessing the design merits of proposals.</p>
<b><u>D2 – Delivering Good Design</u></b>	<p>Whilst RL recognise the benefits of Design Review Panels in the planning process there is significant concern regarding the approach of the policy (D2 E,F,G) in its current wording. A recurring issue with the planning process that presents risk and often development proposals coming forward is the time and uncertainty of the planning process. We would therefore make the following comments to be reflected in a revised wording for this policy.</p> <ul style="list-style-type: none"> <li>• The independence of the DRP process needs to be a key principle and process of oversight introduced to provide confidence to all stakeholders including applicants and residents. In many instances DRP processes are utilised or managed at a local level to focus on specific views of Council officers rather than provide a truly independent assessment.</li> <li>• Whilst the potential benefit of DRP process for referable applications are understood the introduction of an absolute requirement for this is not supported given the current limited DRP resourcing/availability which would mean such a requirement is not deliverable. In its current wording, this would result in a situation where often proposals are delayed or not brought forward due to delay in the planning process or subject to disadvantage in their assessment (when proceeding without a DRP review) due to no fault of the applicant.</li> <li>• Further definition on thresholds for DRP at local levels should apply and the same concerns as identified above in relation to resourcing and a blanket requirement apply. The wording of the policy needs to be amended to introduce a responsibility on the Council to provide the DRP process in a set timescale and that this should only be required for the most significant schemes.</li> <li>• Threshold should clearly be for most significant schemes given additional financial cost of this process at risk.</li> </ul>
<b><u>Policy D8 Tall Buildings</u></b>	<p>RL welcome and support the principles of this guidance in relation to tall building with the specific identification that tall buildings have an important role in meeting regeneration and economic growth goals. RL are in the position of holding a number of assets within areas with potential for tall buildings, including the Six Bridges site within the London Borough of Southwark. It is however apparent that development of sites, particularly within regeneration and opportunity areas, carries significant risk and cost for reasons including but not limited to the retention/reprovision of industrial uses, land remediation costs, relative reduced values (at the beginning of a process of regeneration) which pose real risks to the viability and deliverability of schemes. Therefore having a strong and clear policy which allows a density of accommodation to be achieved to support these costs and maximise the potential benefits of a scheme (whether residential housing or employment space) is key.</p>
<b><u>Policy D11 Fire Safety</u></b>	<p>Fire safety is a critical and essential requirement of new development and a responsibility that RL take extremely seriously working with designers, tenants and suitably qualified inspectors. We however consider that the requirement for a Fire Statement for Major Applications as part of the planning process should be reconsidered.</p> <p>LPA planning officers by their own admission are not suitably trained or qualified to assess a development proposal in relation to fire safety with any such requirement at best duplicates or at worst will undermine the existing clear building regulations regulatory route to assess and approve these arrangements.</p>
<b>4. Housing</b>	

<p><b><u>Policy H1 – Increasing housing supply</u></b></p>	<p>RL are supportive of residential development where appropriate but we do not want to have to bring a residential scheme forward at the expense of other options in all cases where this would be to detriment of our policy holders (life and pension policies). We would expect the GLA to accept this as a key and legitimate consideration. Fundamental to our business model is long term income generation to provide security to our policy holders. As such the development or management of uses such as office, retail, industrial is often preferred with residential sale not always compatible with our fund requirements, although to be clear RL have and continue to deliver residential development.</p> <p>Whilst we do not object to the support for residential housing we request an amendment to the policy which recognises (particularly related to part H1 B2) that their other uses may be appropriate for available sites. We need flexibility in the wording of the policy to bring forward the correct use for the site that reflect market demand at the time, the local market and also the long term income requirement of our funds and policy holders.</p>
<p><b><u>Policy H5 – Delivering affordable housing</u></b></p>	<p>The provision and objective to deliver affordable homes is supported. The provision of affordable housing that a scheme can support or provide is based on a number of factors including site specific constraints and intrinsically the overall financial viability of the scheme. Commercial viability of schemes is wide ranging across London depending on location and the scale of development permissible. From our experience, we would suggest that a 50% strategic target is unrealistic and would result in the majority of developments (if applied to each case) being unviable.</p> <p>The threshold policy (H6) within the Draft London Plan is noted and understood however we would recommend that the strategic target is set to a more realistic level and as a minimum a specific acknowledgment in the wording of the policy of the key role viability will have in determining the affordable housing provision that a scheme can support.</p> <p>In relation to the supporting text of the policy paragraph 4.5.3 is concerning stating that ‘<i>schemes are expected to deliver at least the threshold level of affordable housing without grant of public subsidy...</i>’. This presumption is at odds without the recognition that the affordable housing provision is subject to site specific considerations and viability setting either a 35% or 50% provision as the norm and expectation where a lower provision will in most cases be fully justified.</p>
<p><b><u>Policy H6 – Threshold approach to applications</u></b></p>	<p>RL supportive of threshold approach in principle. However, to provide certainty to the market and ensure residential delivery there needs to be greater clarity and confidence given that boroughs will comply with this approach (both in terms of total provision, tenure and review mechanisms). Paragraph 4.6.13 (different levels in Opportunity Areas) needs to be changed to provide more confidence and clarity to developers who are bringing forward or purchasing land at significant risk. An explicit sentence within the policy requiring LPAs to comply and ensure policies are in accordance with this approach would assist greatly rather than the current wording which could lead to Councils at a local level taking a different approach undermining the certainty that this policy aims to provide to the development sector.</p> <p>In relation to the 35% threshold based on our experience of development viability we consider that this provision as a standard is too high and that a reduced level of a maximum of 25% would better reflect the typical viability of proposals in London. We would consider that this level would be much likelier to result in the residential delivery coming forward to meet the needs as established within the Plan.</p> <p>RL do not consider the 50% requirement for SILs, LSISs and other industrial sites appropriate or well considered. There are implications in terms of viability, deliverability, density and design. Many industrial sites are not located in areas of high land values, and are often complex sites adjacent to other industrial uses with poor public transport connections. 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. Furthermore, industrial sites often have abnormal costs due to contamination, the provision of open spaces etc, which can further dis-incentivise delivery. Redundant industrial land is a big source of housing supply which should be optimised, and it is considered that this policy will discourage its redevelopment. RL do not consider this 50% affordable housing requirement appropriate, and would request that sub point 3 in the above policy thresholds is removed with the same fast track threshold target provision applied as for other land uses.</p> <p>In relation to viability our experience is that insufficient weight or consideration is given to legitimate risk and costs in terms of legals, neighbourly matters, changing market conditions, build costs and time. We would press the GLA to provide confidence and certainty that these matters will be fully taken into account when assessing the viability of proposals. Our valuations are based on RICS Red Book guidance and this should be a starting point for any viability assessment. In addition, RL have significant concerns over the misuse of viability review mechanisms which provide no incentive to maximise returns and are unduly cumbersome in application. We would request that the GLA is very firm with boroughs who are applying review mechanisms as standard contrary to the approach of the GLA and direction of the Draft London Plan.</p>
<p><b>6. Economy</b></p>	
<p><b><u>Policy E1 – Offices</u></b></p>	<p>RL support the protection and objectives to increase office stock throughout London, through the development of new office schemes, mixed use schemes and extension and refurbishment of existing office buildings. RL note and welcome the protection and policy support for the provision of office floorspace within the Central Activities Zone.</p>
<p><b><u>Policy E2 Low Cost Business Space</u></b></p>	<p>RL recognise and support the provision of a range of types and sizes of business spaces that are provided in the market. We note that policy E1 provides scope for the provision and protection of a range of businesses and includes the recommendation of the use of article 4 direction to protect existing office stock, which in many cases will include the smaller units suitable for SMEs. It is our view that this policy provides an appropriate and balanced strategic policy in relation to office stock and ensuring a range of types (size/value) is provided. On this basis we would recommend that policy E2 is deleted.</p> <p>Notwithstanding this recommendation we consider that the policy in its current wording if progressed it is unsuitable and potentially damaging. A requirement to protect and provide small and medium units are part development proposals will not only stifle and prevent development coming forward but also is not compatible with the meeting the full range of office needs that London requires. The market provides and has a natural cycle of a range of office types which vary in size, location and affordability. Clearly the policy in its current wording would undermine the replacement of tertiary or secondary office space with grade A office space through development which forms a key part of the natural cycle of the office market sector.</p>

	<p>The delivery of new office and light industrial development, particularly those in areas of lower value, is constrained by viability, the artificial requirement for a provision of certain sized units will significantly undermine the viability of many schemes. In addition, the requirements of this policy do not reflect the economic importance of providing new office development which provides for instance head offices, campus office developments, or key office agglomerations etc. Where there is demand for flexible and co-working spaces these are already being promoted at local level and delivered in most cases by the market as bespoke products in the right locations with good transport links, appropriate management and services/infrastructure to support the needs of SMEs and similar businesses. In addition to these concerns there are other management, security and lease structure issues will make an absolute requirement for SME units within larger schemes unattractive to landlords, landowners and developers.</p> <p>RL consider that this policy will have a detrimental impact on the future supply of B1 business space unduly compromising the redevelopment, refurbishment or expansion of office development, to meet the demand outline in Policy E1. We do not consider that a strategic London wide policy directive for the provision of SME suitable business space in this form is effective or appropriate.</p>
<b><u>Policy E3 – Affordable Workspace</u></b>	<p>RL in our asset management provide new and existing accommodation to support a range of businesses in type and size. Values for this accommodation are informed by the open market based on a number of factors including location/accessibility and quality/amenity of space. RL do not support the principle of an artificial reduction in the market value of office accommodation within the planning system as proposed under policy E3. A key part of a business becoming profitable and sustainable is identifying accommodation based on the above factors and is affordable to their means.</p> <p>The provision of isolated units of affordable workspace within larger schemes does not align with examples of successful SME hubs and quarters suggesting a more strategic approach to provision is required to provision of such accommodation.</p> <p>We would recommend that this policy is removed. Notwithstanding this if progressed there is a lack of clarity in the requirements of the policy and coordination with boroughs which will de-incentivise the development of sites. At the very least the provision of affordable workspace should certainly not be a requirement for all commercial development across the whole of London. If required, this should be on the very largest of schemes and there should be greater flexibility in how addressed including the option of a financial contribution toward starter business hubs on public sector land.</p>
<b><u>Policy E4 – Land for industry, logistics and services to support London’s economic function</u></b>	<p>Part H of the draft policy sets a requirement for SME provision in development greater than 2500 sqm. RL object to the requirement and advice that it should be removed from the policy. A requirement for the provision of units suitable for SME’s is unsuitable and creates an unnecessary constraint in the development on often complex and challenging industrial sites. The provision of SMEs is unfeasible or not advantageous to many industrial and logistics operations across London. In its current wording, the policy is likely to be a significant obstacle to the redevelopment of industrial sites to provide enhanced facilities (as part of cycle of improvement and investment) or as part of a mixed-use development in response to policy E7 of the Draft London Plan.</p>
<b><u>Policy E7 – Intensification, co-location and substitution of land for industry, logistics and services to support London’s economic function</u></b>	<p>Policy E7 sets out the Draft London Plan’s policies in relation to intensification, co-location and substitution for industrial, logistics and servicing land. Industrial land form a significant part of RL existing portfolio including sites at Colindale, Brentford, Southall and the Old Kent Road within London. As a landowner of these assets RL welcome the policy support provided for the intensification of such business uses.</p> <p>Part D of the policy states that mixed-use or residential development proposals on Non-Designated Industrial Sites will be supported where certain conditions are met. Whilst there is likely to be challenges to such development and certainty co-location of uses will not be the appropriate approach in all instances RL welcome the support for co-location of uses in appropriate locations. Co-location clearly has the potential to provide significant benefits, particularly in relation to the development of redundant industrial land.</p> <p>The complexities of colocation development however are apparent as is the potential impact on the financial value of industrial and residential units delivered as part of a co-location scheme (in comparison to either as a single use). Given this it is essential that planning requirements such as affordable housing are set at a level to make such development viable and incentivised. The application of a 50% threshold approach for such sites does not reflect this reality and should be significantly reduced in accordance with our comments on policy H6.</p>
<b>9. Sustainable Infrastructure</b>	
<b><u>Policy SI12 – Minimising greenhouse gas emissions</u></b>	<p>The proposal to increase the carbon offset amount to £95 per/tonne is cumulatively with other development requirements identified within the Draft Plan contrary and likely be a significant obstacle to achieving the growth set out in the document. It is appropriate that development in its construction and performance is sustainable and energy efficient. However, the requirements of this policy go significant beyond this placing an undue obligation and financial pressure on development and failing to have regard to the many positive aspects that development can bring.</p> <p>Whilst the GLA may suggest that viability can be referred to this is a costly process with no certainty in relation to the outcome. The effect of this and other requirements is to in many cases prevent development proposals (which may better optimise the use of land) coming forward at an early stage given the risk and planning requirements of this option versus management of the existing asset in its present or upgraded condition.</p> <p>RL consider that there should be no financial contribution beyond the onsite target reductions set out in the policy for major development.</p>
<b>10. Transport</b>	
<b><u>Policy T1</u></b>	<p>Consider that particularly for outer London Boroughs needs to be recognition that supporting transport infrastructure does not exist to support fully car-free journeys/car-free development. Sites with a low and medium PTALs should have greater flexibility with regards to car parking numbers for development.</p>
<b><u>Policy T3 – Transport capacity, connectivity and safeguarding</u></b>	<p>Supportive of improvement in transport infrastructure, particularly as growth and delivery of schemes requiring financing is predicated on transport improvements. The delivery of new and improved infrastructure to areas to create the context and market conditions to support and facilitate the development is key. We would emphasise the importance and responsibility of the GLA and its partners in ensuring the delivery of this identified infrastructure to enable and optimise development potential. An example this would be the importance of the delivery of the Bakerloo Line Extension into the Old Kent Road Opportunity Area which will facilitate the development of RLs assets in these areas. Funding for this need to be resolved at a strategic, national and regional level with the GLA having the lead responsibility to achieve this in London.</p>

<p><b><u>Policy T6 – Car parking</u></b>  <b><u>Policy T6.1 – Residential parking</u></b></p>	<p>The policy in its current wording is overly restrictive in relation to parking provision and not reasonable or proportionate to the needs of future residents across London or meet the needs of employers and businesses. In its current wording, the policy may prevent development coming forward in many locations such as outer London boroughs with medium to higher PTAL ratings where the failure to provide cars will undermine the attractiveness and viability of development whether residential or commercial. These are often the very areas where new development is most required and finely balanced in terms of viability. In addition, in many cases in London even around stations, there is not sufficient choice with transport links to justify no car provision.</p> <p>In relation to the provision of ECVPS we agree with the provision of passive infrastructure however the current provision of 20% ECVPS seem rather high and should be reduced to avoid the provision of significant electrical infrastructure and associated costs which will never be used and could be allocated to other areas of the development.</p>
<p><b><u>Policy T9 – Funding transport infrastructure through planning</u></b></p>	<p>RL are supportive of the delivery of Crossrail 2 as a strategically important infrastructure for London. However, it must be recognised in setting any MCIL2 rate that the viability of development should not be undermined and no contribution should certainly be required up until a point where there is certainty regarding the delivery of the infrastructure. The supporting text to the policy identified that in the event of Crossrail 2 not coming forward funding will be allocated to other strategic infrastructure where there is a significant funding gap. This is a wholly unacceptable approach with their needing to be confidence and clarity of the relationship between the development and the infrastructure provided.</p> <p>Additionally, we note that the consulted charging levels for MCIL 2 represent a significant increase on existing MCIL 1 and Crossrail Planning Obligations costs (regardless of indexation). Again, this represents another additional cost and burden for development at a time of increased risk in the property sector and should be revisited.</p>