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By e-mail copy only

Dear Sir

THE NEW DRAFT LONDON PLAN (DECEMBER 2017) - REPRESENTATIONS BY TELFORD HOMES Plc.

On behalf of Telford Homes, set out below are our representations to the New Draft London Plan. Telford Homes are a prominent developer operating across London and have successfully delivered developments ranging from stand-alone sites to large scale estate regeneration. Telford Homes deliver 800 – 1000 new homes a year and work only in London.

Our reputation is built on high quality design, excellent customer satisfaction and delivering the homes and places Londoners need. In order to achieve this, Telford Homes manage the complete development process from acquisition and planning, through to construction and marketing. As a responsible business, we have been working in innovative and sustainable ways for many years. We launched our 'Building a Living Legacy' (BLL) sustainability strategy in 2016. It underpins our commitment to create places that stand the test of time by making a positive long term contribution to London's built environment.

Our reputation is not only demonstrated with the trust and strong relationships we have with Registered Providers, Local Authorities, Investors and Build to Rent providers, but also by recognition with 19 awards received last year from within the development industry.

The London Plan is integral to the above as it helps facilitate the development London requires and within an achievable timescale. Therefore, it is important that the London Plan strikes the right balance between ensuring mandatory requirements are met and allowing sufficient flexibility on other aspects to ensure the sustainable development that the London Plan sets out is achieved. Telford Homes support the aims and the objectives of the London Plan and hope that the representations below are considered during the consultation period.

Chapter 1 - Planning London's Future

Telford Homes support the six Good Growth policies, which provide an overarching principle for the London Plan. Aspects such as making the best use of land will be one of the key catalysts for



achieving the aims and objectives of the London Plan, but in particular to meeting the annual housing targets.

Chapter 2 - Spatial Development Patterns

Policy SD1 – Opportunity Areas

Telford Homes support the principle of Opportunity Areas and the need to be 'prepared in a timely manner'. In some cases, large scale developments can be stalled due to the lack of progress and adoption of Opportunity Areas Planning Frameworks/Development Allocations. It is therefore important that Policy SD1 recognises that in some cases, sites may come forward quicker than the adoption of opportunity areas and there is a need accommodate for this, in particular if it aligns with the Opportunity Area objectives and could kick start further development and accelerate regeneration.

Policy SD6 – Town Centres

Telford Homes support housing led intensification within Town Centres. There are undoubtedly locations for mixed use schemes with commercial or retail uses on the lower floors. Often, retail and commercial uses involve particular servicing and parking arrangements, which can take up considerable ground floor space. It is considered that the London Plan should recognise this and encourage the dual use of back of house areas for both the residential and non- residential use.

Chapter 3 – Design

Policy D1 – London's Form and Characteristics

Telford Homes acknowledges that developments should correspond to the scale and form of a specific locality. However, it is recognised that in certain areas which are targeted for substantial growth to deliver London's housing requirements, in particular opportunity areas, a more flexible policy should apply. These opportunity areas are set to take on a high proportion in delivering London's growth and by definition, this should take on their own form, scale and characteristics. As such, large scale developments in opportunity areas will inevitably be of a scale large enough to define their own architectural and urban context in line with good urban design principles. Policy D1 should be reviewed to take into account the above, in addition to local building typology, scale and height.

Policy D2 – Delivering Good Design

Telford Homes support the principles of Policy D2. With regard to 'initial evaluation', 'determining capacity for growth' and 'Design Quality', it must be recognised that design development should not be set within rigid frameworks. There are several examples of high quality developments in London that have breached existing approved/established 'parameters' and therefore there must be an

acknowledgement that sites will be considered on a site-by-site basis and/or that there are tolerances within Masterplan/Design Codes.

With regard to Design Scrutiny, there is no objection in principle to Design Review/Design Review Panels. However, careful consideration should be given to how these are undertaken in practice. In particular to London Borough's that already have Design Review Panels, it would not seem appropriate to have a further independent Design Review. Design is subjective, so no response is ever identical, so conflicting views on design is only likely to stall developments that come forward. Equally, this situation could occur with London Borough's without Design Reviews. In summary, from the outset, it should be made clear which route any applicant should follow to avoid conflicting views and delay during pre-application.

In relation to post planning and the procurement of securing the existing design teams involvement (paragraph 3.2.10), careful consideration should be given as to how this applied in practice. Whilst Telford Homes endorse high quality, securing the project architect is not always possible. This is because personnel as well as architectural practices themselves change and some practices do not have the capacity to undertake 'working drawings', in particular, where timescales are tight for construction on site.

Policy D4 – Housing Quality and Standards

With regard to private outside space, it is considered that the policy provides flexibility to 'internalise' the private amenity space. External balconies are not suited to all developments, for example, some apartments face onto railway lines and therefore the space would be better utilised as part of the internal apartment, which could provide a better living environment.

With regard to tenure integration (paragraph 3.4.8), Telford Homes support integration, but the London Plan should not be so prescriptive as to suggest all tenures should have the 'same' external appearance. On large scale sites, this could result in 'bland' designs. The London Plan should state that the same design 'quality' should be designed in all tenures and demonstrated in the planning application/Design and Access Statement.

Policy D6 – Optimising Housing Density

Telford Homes support Policy D6, but all sites should be considered on a site-by-site basis. There are many small constrained sites in London that could deliver new homes, but are often overlooked due to perceived 'over development' linking back to density. Good design, with full consideration to standards and living environments should not be hampered by density. Density is a product of design and the overall benefits of a development need to be considered in context to density, but not prescribed by it.

Densities should be maximised particularly in London's growth corridors and opportunity areas. The London Plan should set minimum densities in these areas which could kick start development. Part C of the Policy D6 sets out higher PTALs to higher densities, however this should be expanded to include areas within PTAL 6a and 6b which are also within the opportunity areas. In such areas, the level of density should be even higher, for example 650 units per hectare. This will encourage the

growth London needs in the appropriate locations. This is particularly pertinent in locations which are set for increased infrastructure capacity such as Crossrail stations or London Underground extension areas. In addition, whilst Telford Homes support Management Plans, the affordability of running costs are not always known at application stage and it needs to be demonstrated in further detail why this would be a test in relation to density.

Policy D8 – Tall Buildings

Telford Homes have no concerns regarding the approach to tall buildings in principle. With regard to the ‘functional impact’ the issue relating to capacity (Section d) is of similar ilk to Section B3 of Policy D6. The same tests should apply in so far as where capacity cannot be met, the Borough, Applicant and Infrastructure Providers should work together to mitigate these concerns.

Policy D11 – Fire Safety

Telford Homes wholly support the principles of Policy D11 and have no objection to the preparation of Fire Statements. However, careful consideration needs to be given as to how the statement is assessed at planning stage, to ensure that Building Regulations are not introduced at the planning stage as certain details will only become available post planning.

Chapter 4 - Housing

Policy H4 – Meanwhile Uses

Telford Homes supports the use of meanwhile uses, but the terms in which this operates needs to be clarified. Therefore, Telford Homes support paragraph 4.4.1 to ensure there is an established framework going forward with regard to use and duration between all parties.

Policy H5 to H7 – Affordable Housing, Threshold Approach and Tenures

Telford Homes provided representations to the ‘Homes for Londoners’ SPG in February 2017 and following the adoption of the SPG in August 2017, much of this has been translated into the London Plan. Following a year in practice since the draft SPG, it is considered the following should be taken into consideration for policies H5 to H7.

Telford Homes support the clear 35% threshold which if achieved on site negates the need for a viability assessment. This adds clarity to the process and removes any delay or negotiation on viability from the planning programme which gets homes on site under construction far quicker.

The commitment to have no requirement for a viability report, in practice however has been stalled by the additional condition that the scheme must hit other relevant planning policy requirement. This is confirmed in Policy H6 (Section C3). This creates a rigid framework which would push (and has) almost every development into a Route A as it is not feasible to achieve every policy requirement without deviation. It is considered a more pragmatic approach would be if the 35%

threshold is met and the scheme broadly accords with other planning policy requirements to the satisfaction of the LPA, the fast track route can be pursued.

In addition, a significant issue of the difficulty of achieving policy compliance in every aspect of the scheme, relates to tenure split (Section C2). Where schemes are smaller, achieving the exact policy tenure split can be difficult as small changes in tenure create large percentage swings. Therefore, clarification would be helpful as to how 'consistent' tenure splits are required to be.

In relation to Paragraph 4.6.6, whilst Telford Homes support the need and function of industrial sites, it is considered that not many sites will be able to benefit from the fast track route as they will need to meet the 50% affordable housing threshold. Industrial sites are very different to brownfield sites owing to several different issues, which can make it harder for such sites to come forward. The 50% threshold will only add to the potential delay in the release of sites that could be redeveloped, so the threshold of 50% should be re-considered.

Policy H13 – Build To Rent

Telford Homes welcome further clarity on Build to Rent schemes given this emerging market, which will help considerably with regard to the delivery of housing in London. As such, there should be further policy direction and clarity for developers to bring forward Build To Rent schemes, so it is better understood, particularly in the absence of Build to Rent policies at Borough level.

Chapter 6 – Economy

Policy E3 – Affordable Workspace

Telford Homes consider that the provision of affordable workspace needs to be considered in the context of the other aspects that are to be delivered on site, such as affordable housing, in particular to mixed use schemes. Therefore, any affordable workspace provided needs to be considered in the overall viability of a scheme.

Policy E7 – Intensification of Industrial Land

Telford Homes support mixed use development including the co-location of industrial uses. However, the 'no overall net loss' of industrial floorspace through re-development should be re-considered. Such sites that could suit mixed use development maybe hindered by the need for like-for-like replacement of industrial floorspace. For example, some industrial sites often house large factories/warehouses, where it would be difficult to re-provide and still accommodate meaningful residential development. The employment sector has developed whereby greater number of jobs can be provided for in less space and therefore providing a better balance of employment and residential. The floorspace test should therefore be omitted from Policy E7.

Chapter 7 – Heritage and Culture

Policy HC3 – Strategic and Local Views

With regard to section 'A' of Policy HC3, whilst the Mayor has identified the strategic views, greater clarity is required on what is perceived as the 'background' of those views to help ensure when the test of compromising the setting is considered.

Chapter 8 - Green Infrastructure and Natural Environment

Policy G5 Urban Greening

The consequences of not meeting the requirements in Policy G5 on site is not clear. New guidance is required, to provide the clarity on the costs of an offsetting tax (cash in lieu) for non-compliance, so this can be assessed in conjunction with the overall viability of a scheme.

It is also recommended that further evidence is collected of more typical London schemes, rather than the exemplified exception sites. It is suggested that a transitional trajectory be applied over the next 5 years to recognise the nuanced context of mixed used schemes; rather than the proposed targeting of 0.4 for residential, and 0.3 for predominately commercial development. A target of 0.1 should be set and thereafter an increasing trajectory is set-out in a roadmap.

Otherwise, and given the competing requirements to increase new homes outputs, incorporating mixed-used activities, density and amenity space on medium to high density schemes, it seems inevitable that such schemes and building typologies will be subjected to higher levels of financial burden, despite providing and supporting a diverse range of economic, and socio-environmental benefits.

Chapter 9 - Sustainable Infrastructure

Policy S1 - Improving air quality

Telford Homes consider that the high-level ambitions (by way of example Air Quality Positive approach and transitioning away from CHP) are appropriate. However, further detail and clarity is required in the form of macro (decarbonisation of the grid) through to detailed policy, guidance, e.g. changes to SAP, CO2 emission factors, monitoring protocols etc. Similar to our comments above, further evidence is required before this new policy can be supported.

S2 – Minimising greenhouse gas emissions and S3 – Energy infrastructure

The high-level ambitions of Policy S2 are generally appropriate. However, further detail and clarity is required in the form of the decarbonisation of the grid, through to detailed policy, changes to SAP, CO2 emission factors, the outlined TER's and their impacts on, by way of further example CHP scheme proposals, monitoring performance protocols etc.

It has been understood for many years, that CHP has a range of negative impacts on air quality, short-term redundancy and limited resilience. Accordingly, recognition of these limitations is supported and the ambition to look at other forms of low-carbon and renewable technologies.

However, far greater detail needs to be discussed / agreed, than the consultation currently provides including greater flexibility with regard to the introduction of offsetting schemes that include the upgrading of existing homes and buildings. Telford Homes consider embodied carbon has a part to play in offsetting through GI and passive-design strategies, innovative building forms and materials, and macro / micro-technologies and battery storage in use. This could be considered in new SPDs to fully explore, develop and implement such requirements, along with gaining a more thorough understanding of the implication of increasing the current tax (a cash in lieu contribution) to £90 per tonnes of CO₂.

In addition, cross borough-boundary approaches to delivering carbon abatement and financial tariffs needs to be carefully considered / enacted. For example, a) the purchase of third party verified carbon offsets which fund energy or carbon projects in London and/or b) a commitment to purchase green power or green gas contracts for a 30-year duration post completion, or as mentioned above c) upgrading of existing homes and buildings, or d) offsetting through GI, embodied carbon of the built-form. This last point also has a tangible and interrelated potential benefit for building demountability as part of a circular economy model.

Given the complexity of these matters, Telford Homes would be keen to be involved in a multi-stakeholder sounding-board to ensure an appropriate and implementable SPD is drafted.

Central Government and the Mayor must mandate new powers to enact the necessary infrastructure changes for all new and the upgrading of utilities provision to underpin London's vision. In addition, new powers must be sought to ensure the sustainable retrofitting of existing buildings / places, without doing so, the proposed energy and carbon emissions reductions will arguably not be achieved.

S4 – Managing heat risk

Further to our responses to S1, 2 & 3, Telford Homes support this overarching policy intent. However given the complexity of these matters, further evidence is required and accordingly we would be pleased to be engaged in its development through in a sounding-board capacity.

S7 – Reducing Waste and supporting the circular economy

Telford Homes are beginning to collaborate with the LWARB to understand how we can make a contribution to London's Circular Economy ambitions. Positively, this cross-sectorial approach will be beneficial in reducing wastage for the build-environment sector, and providing resource for other areas of the economy, i.e. fuel for heat networks.

A consistent and coherent cross-borough policy and a set of recycling and storage standards will be required, to encourage a change in behaviours. However, the resulting requirements will inform a comprehensive set of spatial requirements, which will affect the Mayor's Housing etc. policies. Arguably, this will inform increased spatial standards, viability, developer and operational (customer)

costs. Hence a balanced-scorecard approach is required to ensure that societal priorities are ensured against an agreed waste trajectory.

Chapter 10 – Transport

Policy T5 – Cycling

Telford Homes support the promotion of cycling and the need to accommodate so that it is safe for all. With regard to cycle parking in residential developments, it is considered that the ratio is too high. In the context of providing mixed use development, the ground floor is often having to balance competing needs, and cycle parking can take considerable space, which is not commensurate to the demand. This can often lead to creating basements, which is not cost effective. Telford Homes consider the ratio of parking should be lowered or a London wide review is undertaken to understand current cycle parking occupation in residential developments.

Summary

In summary, Telford Homes' position is one of general support for the London and its aims and objectives. There are however as discussed in this letter, elements which require further thought and clarification. We trust that the above representations will be duly noted and considered during the adoption of the London Plan. Should you need to contact us regarding the above, please do not hesitate to contact Amit Malhotra or Mongezi Ndlela of this office.

Yours faithfully



Telford Homes Plc