

THE DRAFT LONDON PLAN - THE SPATIAL DEVELOPMENT STRATEGY FOR GREATER LONDON PUBLIC CONSULTATION - DECEMBER 2017

These representations are submitted by WYG Planning, on behalf of our client, who is delivering a large mixed-use Build to Rent (“BtR”) led development in North West London, in response to the Draft London Plan - Spatial Development Strategy for Greater London Public Consultation.

In general, our client welcomes and supports the overall ambition of the policy change being promoted through the new London Plan (the 'draft'). We consider that a change in strategic policy is necessary if Boroughs are to keep pace with the key challenges and opportunities facing London over the next twenty years and beyond. In particular, an increased focus on quality of life and a new approach to outer London, employment land and SMEs are all positive additions to the draft that are needed if quality social and environmental outcomes are to be achieved and truly sustainable communities across greater London are to be created.

Our client is the London developer behind the transformation of a large mixed use BtR development in an Opportunity Area in London, which it acquired in 2002. The 85 acre site will include 5,000 BtR homes by 2024, making our client’s site the largest single-site purpose built PRS development in the UK.

The draft plan looks very different to the 2011 version and promises a 'step change' from previous approaches, to meet the particular challenges of population growth and housing need. London's population is expected to increase by 70,000 every year and 66,000 new homes are required each year to meet this demand. The Mayor of London's strategy to address these issues is referred to as 'good growth'. In essence, this approach seeks to deliver more affordable homes and economic prosperity, whilst creating a safer, greener city that supports the health and well-being of all Londoners.

In many cases, the policies in the new plan have been drafted with specific criteria to be applied directly in the assessment of planning applications. At 528 pages, the new plan is longer than previous versions and more prescriptive on matters such as design, conservation and heritage. GLA officers have stated there is no need for boroughs to duplicate the policies in their Local Plans, unless there are locally specific reasons for doing so. As such, policies can be applied directly in the determination of planning applications.

The purpose of the London Plan is to provide a strategic spatial planning framework for London, rather than detailed planning policies to be used in the determination of planning applications. As it stands, it is our client’s view that the document is too prescriptive on these matters. Many of the policies are not of strategic importance to Greater London and their inclusion in the plan should be reviewed prior to its adoption.

We are also concerned that the GLA have not carried out a sufficiently robust viability assessment on cumulative impact of the new policies on development within London. We fear that when all the policy expectations of the draft plan are sought at planning application stage they will have a material impact on delivery.

We note the wording in paragraph 00.20 which states;

“On some occasions, the Plan deviates from existing national policy and guidance; this is mainly where the Plan is delivering on a specific Mayoral commitment and reflects the particular circumstances of London. The scale of the Mayor’s election victory provides a significant political mandate to use the planning system to deliver his manifesto commitments”.

The acknowledgement that the plan deviates away from national government policy and guidance on the basis of a political mandate is not supported.

The Mayor has identified some ambitious targets for London over the coming years, and the GLA and mayoral team will be critical in ensuring these aspirations are achieved. Many local authorities are suffering from budget cuts and under resourcing, and whilst localised planning and decision making are important to ensure accountability the Mayor must provide stronger policies on these key strategic issues to give him the tools to lead the growth agenda.

Our client wishes us to make the following observations and detailed comments on the draft London Plan for your consideration.

Policy GG2: Making the best use of land

Our client supports Policy GG2 of the London Plan. They recognise the importance of prioritising development of Opportunity Areas and ensuring high-density mixed-use developments are delivered on Brownfield land. Our client's site is a key example of this, maximising the potential of brownfield land on a site that is well connected by existing tube and rail stations, with an average PTAL rating of 4 and 5.

Whilst they agree with the prioritisation of development in the town centre, they also support Policy GG2's intention to support edge of town centre developments, recognising this type of development can often complement the town centre's offer rather than competing with it.

Policy GG4: Delivering the homes Londoners need/ Policy H1: Increasing housing supply

Our client supports the ambitious plans for increasing housing supply to deliver 66,000 additional homes in London and 2,915 homes in Brent per annum. However, they do have concerns over the feasibility of meeting the housing target when viewed with the London Plan's challenging requirements including affordable housing, design standards, urban greening and energy requirements for example. When each policy is viewed in isolation they may not seem too onerous but collectively the impact is yet to be fully tested and they may lead to a slowdown in delivery particularly in the first few years of the plan.

Policy GG4 states that 'delivery is not keeping pace', therefore the policy should further recognise the importance of the Build to Rent (BtR) sector for delivering new homes quickly and providing an alternative model for London's renters (see Policy H13 response for further details).

Policy H1 is thorough in exploring a number of the ways in which housing delivery can be increased and the factors that London's boroughs should take into account which our client supports. However, it is not clear how the Mayor's allocation of housing targets relates to the Government's new proposed standardised methodology for assessing objectively assessed need (OAN) and further detail on this point should be included.

It is also not clear from Policy H1, what the Mayor is proposing to ensure there are measures in place that would come into effect to address under-achievement of a Borough's housing requirements, and how the Housing Delivery Test would apply once it has been introduced nationally.

Policy SD1: Opportunity Areas

Our client supports Policy SD1 of the draft plan. As set out previously, Opportunity Areas encourage high density mixed-use developments in areas that have significant development capacity to accommodate new housing, commercial development and infrastructure. Our client's site is located within an Opportunity Area which has delivered or has planning permission for 7,000 new homes. 5,000 of these will be available for rent, all under our client's ownership, and will be completed within the next seven years (2024), making it the single largest Build to Rent scheme in the UK. Over 40,000 sqm of retail floor space and over 70,000 sqm of office floor space will be provided. One of the benefits of Opportunity Areas is the ability to masterplan the site, providing necessary infrastructure to complement the residential and commercial uses, such as a new primary school, health centre, community hall and 7 acre park.

Whilst our client supports this policy they suggest there is a need for more specific strategic guidance on the Opportunity Areas. For instance, previously designated Opportunity Areas are referenced but there is no proposed text to describe these Opportunity Areas. The plan should be more proactive in terms of setting out what should be delivered at particular locations rather than a more restrictive approach in policy terms.

Policy SD6: Town centres

Our client supports Policy SD6 of the London Plan, in particular the reference to town centres being a suitable location for Build to Rent and mixed-use developments. As previously highlighted, our client is delivering the single largest Build to Rent scheme in the UK, the majority of which is located within the town centre or edge of centre. Our client has delivered two BtR developments that have already been completed (one scheme comprising 472 rental units and the other scheme comprising 362 rental units) and successfully occupied without delay. These provide two examples of BtR schemes in town centre locations, situated between a tube station and a railway station that are complemented by a strong retail and leisure offer.

Policy SD7: Town centre network

Our client supports Policy SD7 of the London Plan, particularly the need to identify deficiencies in the London town centre network by promoting centres to function at a higher level. Whilst our client's site is located within a designated Major town centre, it is a high performing and growing centre that continues to increase its retail, leisure and commercial offer and should therefore be considered for Metropolitan status.

The draft plan describes Metropolitan centres as serving wide catchments and typically containing at least 100,000 sqm of retail, leisure and service floorspace. These centres should have good accessibility, employment, leisure and service functions.

The draft plan states that Metropolitan centres can only be changed through the London Plan. For that reason, detailed below is the list of requirements for a Metropolitan centre together with justification for why Wembley should be awarded Metropolitan status:

- High order comparison retail
- Large shopping malls

- Town halls and civic buildings
- Larger offices
- Sub-regional culture, leisure and entertainment function

Wembley benefits from all of the above elements. Our client's site has more than 50,000sqm of commercial space; including over 20,000sqm of A1-A5 use, 25,000sqm of C1 Hotel Use and a 3,500sqm 9 screen cinema. A further 40,000sqm of mixed use commercial floor space will become available between 2018 and 2020. When completed, a total of over 100,000sqm of commercial space will be provided and the majority of this floor space will be provided within the Wembley town centre boundary. Furthermore, these figures only relate to our client's site and do not take into account the further commercial floor space provided on Wembley High Road and elsewhere within the Wembley Opportunity Area.

Since its opening in 2013, the London Designer Outlet (LDO) has been an extremely successful retail centre and is the only designer retail outlet within the M25, attracting over 6 million visitors a year for retail, leisure and work. The shopping mall benefits from the largest catchment density for any UK outlet centre as the London Designer Outlet is the nearest outlet centre for 5.8 million people.

Brent Civic Centre is situated on Engineers Way in the town centre and accommodates the headquarters of the London Borough of Brent. The building opened in 2013 and provides office space for over 2,000 Brent staff. The building provides the majority of the Council's services as well as acting as a community hub. The Civic Centre also includes a library, two cafes, entertainment spaces, meeting rooms and a garden used for weddings and ceremonies.

In addition to Brent Civic Centre, Wembley town centre will also benefit from a further 13,476 sqm of office floor space which is due to be completed in 2019.

Wembley town centre has a sub-regional culture, leisure and entertainment offer, attracting a vast audience to a variety of events and uses. Not only do Wembley Stadium and the SSE Wembley Arena attract an international audience, the LDO has a range of leisure facilities including restaurants and a cinema attracting visitors from a wider location. Our client has also recently secured a theatre operator who will be opening a new 'meanwhile' venue in 2018 within Wembley; and Boxpark, a food and beverage pop-up entertainment venue, will also be opening their new premises in October 2018.

It is therefore considered that Wembley town centre should be redesignated to a Metropolitan centre through the London Plan and our client would welcome further discussions with the GLA and LBB on this point and would be pleased to provide additional information on such Metropolitan status.

Policy SD8: Town centres- development principles and Development Plan

Our client supports Policy SD8 of the draft plan. They support the town centres first approach but recognise some town centre uses can be acceptable on the edge of town centres as long as they do not take competition away from the centre.

Furthermore, our client supports the comprehensive redevelopment of low-density retail and leisure parks and surface car parks in town centres or edge of centres to deliver housing intensification. It is

important to make the best use of land, especially in Opportunity Areas where there is increasing pressure and demand to deliver new mixed-use developments.

Policy D4: Housing Quality and Standards

Our client supports Policy D4's intention to allow for flexibility on space standards particularly in BtR developments as set out in the Mayor's draft Supplementary Planning Guidance. Previous London Plan and local policies are tenure-blind and ignore the key differences between BtR developments and units developed for sale. It is important that BtR developments are recognised as a separate house building model that require more flexible space standards as BtR developments contain additional communal areas and services such as resident gyms, laundry rooms and conference rooms. These additional spaces mean that some of the occupier's daily activities may happen instead in communal areas, which could justify a more flexible approach to space standards for individual homes.

Policy D4 is too detailed for a strategic plan and the prescriptive nature of the space standards set out in table 3.1 of the London Plan could inhibit new and innovative forms of housing coming forward; the London Plan should therefore provide an exception for developments which demonstrate exemplary design.

Our client strongly supports flexible space standards in BtR and the GLA must take the lead in this because most LPAs will not do this under their own initiative. This is a key element to ensure BTR can add additionality to London's housing market.

Policy D6: Optimising housing density/ Policy D8: Tall buildings

Our client agrees with the statements in the draft London Plan that for London to accommodate more growth, every development must make the most efficient use of land and an acceptance that this will mean building at higher density.

When determining the optimum density of a site, our clients agree that development opportunities around existing transport nodes should be prioritised to make the best use of existing/ enhanced transport infrastructure. The proximity of public transport is particularly attractive to BtR investors and prospective occupiers therefore those opportunities should be maximised.

High density development and tall buildings can bring significant economic advantages to an area but these policies should set out the benefits of high density development and tall buildings. It is not clear why tall buildings, compared to any other type of development, should take account of their potential contribution to regeneration (D8.B.2).

Furthermore, while our client welcomes the draft plan's proposal to remove the density matrix approach in favour of 'optimising housing density', this reduces certainty and may lengthen the planning process for developing tall buildings. There would be no fixed methodology for calculating whether a tall building could proceed in any one particular location, other than surrounding context.

As with much of the plan, our client considers that the policy on tall buildings seems overly detailed and prescriptive and could easily be rationalised and still contain the necessary strategic guidance.

Policy D11: Fire Safety

Whilst our client supports efforts to achieve the highest possible standards of fire safety for new buildings in London, this policy is too detailed for a planning policy and should not confuse planning material considerations with building control requirements. These standards have to be met under building regulations so do not need to be replicated in the London Plan.

Policy D12: Agent of change

Our client supports the Agent of Change principle and our client is a responsible developer that already ensures that disruption from noise from their developments is kept to a minimum, ensuring that their site has been designed in accordance with the agent of change principle. Our client has been developing next to the SSE Wembley Arena and Wembley Stadium for the past 15 years and through close working relationships with both institutions, they have been able to meet residents' expectations without impacting upon the operations of these iconic venues.

Policy H5: Delivering affordable housing

Given London's housing crisis, the proposed strategic target of 50% affordable housing provision is laudable however our clients are concerned that it is not achievable and has not been fully tested.

Our clients would like emphasis and recognition in policy H5 of the frequently competing needs of planning obligations that developers face – not only in s106 obligations but also via mayoral and local community infrastructure levy (CIL). The decision as to whether the development will qualify for the threshold approach (para 4.5.2) route will sometimes not be one that the developer is able to make, if there are significant other planning obligations and CIL payments. 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. Our client also considers that the GLA need to follow the policy in practice. They would like to refer to numerous examples where despite all parties agreeing the viability tested route has demonstrated the maximum reasonable level of affordable housing is being provided, the GLA seek more affordable housing at the developer's risk. This undermines developer confidence in a Plan led system.

Policy H6: Threshold approach to applications

Our client supports the ambition of a streamlined approach to viability; however, the many requirements associated with the threshold approach are unrealistic and our client does not consider this route to be achievable from most developers' perspective. The policy needs amending to include and take account of paragraph 4.6.8 in the body of Policy wording as the Borough could require the Viability Tested Route is undertaken even if the threshold (and other criterion) is achieved. This will be particularly evident if Council's affordable housing targets are greater than the 35% threshold. The necessary tenure split (Policy H7) (London Living Rent) alongside the required quantum of affordable housing to achieve the "Fast Track Route" is also extremely challenging, in the opinion of our client.

Our client strongly objects to criterion 'H' of Policy H6 as this wording is too prescriptive for a Strategic policy. Our client would recommend this criterion is removed from the policy. The wording is also not clear on what constitutes altering the "economic circumstances". Schemes which have already been granted planning permission and achieved headline affordability levels will be detrimentally impacted if the Viability Tested Route is re-introduced at a S73 stage. This policy, if adopted, will likely prevent schemes being enhanced and coming forward for development which is at odds with Policy H1.

Our client supports the release of industrial land (in accordance with Policy H7). However, in many locations industrial land values are close to or on a par with other land uses. Therefore seeking 50% affordable housing on industrial land (H6b(3)) will result in significantly less vacant industrial land coming forward for redevelopment and make it much harder for the GLA to meet their target of 66,000 units a year.

Policy H7: Affordable housing tenure

Our client supports the Mayor's ambition to provide a diverse mix of affordable housing tenures; however, as our client has experienced across several plots, achieving the threshold of 35% affordable housing and the necessary tenure mix is very challenging. Providing 30% intermediate products including LLR can be very challenging particularly with values in Brent. Including specific threshold targets for tenure groups (such as LLR) can reduce the quantum headline figure compared with other tenures (DMR). Achieving a policy compliant tenure mix and 35% affordable housing is very challenging in Brent.

Policy H12: Housing Size Mix

Our client supports the wording in 4.12.2 that *"Boroughs should not set policies or guidance that require set proportions of different-sized (in terms of number of bedrooms) market or intermediate units to be delivered"*, and the reasons why this is the case.

However, 4.12.5 then contradicts this by stipulating that *"while **one-bedroom units** play a very important role in meeting housing need, and provision in new developments can help reduce the pressure to convert and subdivide existing larger homes, one-person and one-bed units are the least flexible unit type. Thus, unless supported by the borough as meeting an identified need, schemes consisting of over 10 units which mainly comprise of one-person/one-bed units should be avoided to ensure that there is a mix of unit sizes."*

Our client considers that if the Mayor is dissuading Boroughs from having unit mix-based policies, he should not be then being stipulating his own. This should certainly not apply to BtR.

Two bed units should be regarded as family housing and our client support this. Two bedroom units provide a real family need in urban areas for both market and affordable housing. Our client supports paragraph 4.12.4 of the London Plan which acknowledges that *"well-designed one- and two- bedroom units in suitable locations can also attract those wanting to downsize from their existing homes, and this ability to free up existing family stock should be considered when assessing the unit mix of a new build development"*. Our client has first-hand experience of families moving into two bedroom units in order to downsize from larger family homes. Policies which consider 3+ bed units are solely family units are out of date with current demand.

Policy H13: Build to Rent

Our client welcomes the further development of a Build to Rent policy and proactive approach to codifying this in supplementary planning guidance and now the draft LP. Much of the policy is helpful and is supported. There are a small number of aspects, however, that they think could be improved.

The Build to Rent Policy is very prescriptive and is not a Strategic Policy. The policy has a number of requirements which will be difficult to achieve.

The BtR sector already offers longer tenancies when compared to other forms of rented homes. This is seen as good practice within the industry as it secures a more stable long term income stream, fosters stronger communities and improves tenant retention. However, whilst the sector is still at an

early stage in its development, our client does not consider it is reasonable for planning authorities to set minimum tenancies. It is likely this would undermine investor and developer confidence in BtR and in turn reduce delivery. Many funds will not loan on schemes with leases more than 3 years as they are no longer considered to be Assured Shorthold Tenancies. Furthermore, our client's research shows that despite offering up to 3 year tenancies, the overwhelming majority choose 12 month terms. Our client has not yet had a customer elect for anything more than 18 months to date.

Our client generally agrees with criterion B2 that a covenant of 15 years is applicable at the present time. Their most significant feedback, however, is on parts C. and D. of the policy. Part C, stipulates that the threshold approach to Build-to-Rent should be set at 35%. Part D, however, recognises the difference in financial viability between Build-to-Rent and build for sale developments. Therefore, setting the same threshold seems illogical.

Our client estimates that there are very few Build-to-Rent developments in London that have, or could, deliver 35% affordable housing. If the mayor has evidence to the contrary, then it should be made available as part of the Plan's evidence base.

Setting 35% affordable housing in the threshold approach to all intents and purposes means that Build-to-Rent developments will not qualify for the fast track route to application determination. Worse, however, if local authorities think that is the correct threshold, then in the slow track process they will use that incorrect assessment as their opening negotiating position. Our client would rather see a bespoke, worked-up Build-to-Rent threshold and would be most willing to assist in its formulation. As currently drafted H13 provides little, if any, incentive toward the delivery of BTR over market for sale and it certainly won't unlock the additionality required if London is to meet its housing targets.

Policy H18: Large-scale purpose-built shared living

Our client is pleased that the Plan recognises purpose-built shared living as a possible way to meet housing need in London and is also pleased that it encourages engagement between local authorities and private sector providers to deliver this form of living space. This concept opens opportunities for the housing sector, potentially allowing individuals to live in a desired location at an affordable price.

However, our client is concerned by the policies which state that large-scale purpose-built shared living developments are *"required to contribute to affordable housing"* (199). They are concerned that restricting the market for developers (by forcing them to offer a service at a rental price lower to the market rate) will deter supply at a time when increasing the number of homes is critical.

Our client is also concerned that large-scale purpose-built shared living and alternative forms of living, where space will not fall under the remit of 'affordable' (as the price will be the market rate for a property of its size) is being penalised by the policy that stipulates *"Large-scale purpose-built shared living developments are expected to provide a contribution that is equivalent to 35% of the residential units to be provided at a discount of 50% of the market rent"* (198). Alternative forms of living can propose many qualities and can have a very positive impact on the housing market by providing a "place over space" service at an affordable price. They understand the importance of space standards; however, they would suggest flexibility in response to the changing dynamic of the housing market, the demand for housing in London and those who desire 'location over space'. Large-scale purpose-built shared living also offers a "socially active living" service. Purpose-built shared living helps pioneer a new ideology of living that can diminish "loneliness" by incorporating a combined communal space, which encourages more social interaction between residents. However, our client feels that the draft policy may well halt the development of a form of living that has many social and economic benefits.

Policy S6: Public toilets

Our client supports the policy proposal that large-scale commercial developments, such as shops and leisure facilities, should provide and secure the future management of free publicly-accessible toilets. Our client also agrees that facilities should be suitable to 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 individuals the confidence to move around the area and spend longer in these large-scale commercial developments. The policy is unclear whether developers are required to fund the provision of these facilities in the public realm. This provision should typically be provided by the local authority through CIL as they are not specifically required to support the development but are a wider public facility.

Policy E2: Low-cost business space

Our client agrees in principle with ensuring that small businesses have the businesses space they need to operate and expand, however there are potentially unintended consequences that could arise from the implementation of this draft policy. There is a likelihood that this policy could lead to a reduction in B1 space being retained/ developed/created in new projects, due to the viability constraints that could be placed on regeneration projects and new developments. Protecting existing, low value uses, will add a significant burden to development proposals by both reducing the value of the proposal and potentially increasing costs as additional design measures need to be considered to accommodate the different uses on site. This will either prevent new commercial development or come at the expense of other policy and financial contributions that the development could otherwise make. The unintended consequence of this is that businesses who qualify for lost-cost space may have their chances of securing new premises lessened, as existing landlords could become very wary of leasing them new spaces when a new development is being conceived. Also, this may lead to these businesses being served notice to leave buildings as a precautionary measure (by landlords) against potentially having to re-provide new floorspace for similar users.

Policy E3: Affordable Workspace

While the concept of affordable workspace for a social, cultural, or economic development purpose is laudable, the need for a London-wide policy on this is unclear as London boroughs already have powers to deliver affordable business space through planning obligations. Affordable workspace will be weighed up against other competing priorities that a local authority wants to address via planning conditions and planning obligations. Often other priorities such as social or affordable housing provisions and contributions towards infrastructure are preferred.

The implementation of this draft policy could also lead to some unintended consequences. It could drive incumbent small businesses out of an area, as they struggle to compete with those enjoying preferential terms with regards to the allocation of affordable workspace. Moreover, subsidised units are likely to be assessed for business rates purposes based on rateable value rather than rent passing. This could make the total costs of occupancy (in the subsidised workspace) significantly higher than if the business occupying the property were to find cheaper workspace at market rent. This draft policy may also have a detrimental effect on the industries it is trying to protect, as many charities own their buildings, and to secure up-front lending they effectively take mortgages out on their buildings which are secured by future cash flows of annual donations. This draft policy, as worded, could reduce the value of these buildings and as such harm the lending that the charities can secure to fund their activities.

Our client would also ask the Mayor to consider what implications the cumulative viability impact of having to deliver affordable housing and affordable workspace will have on development. They would

like more information about affordability in the context of workspace; i.e. who benefits, for how long, how it will be managed.

Our client would also request that 'affordable' be defined more clearly. It is defined very differently across boroughs and this confusion could add to the viability concerns and therefore constrain office development, when office space in London is needed.

It should also be noted that this draft policy only provides a vague strategic framework, leaving it to local authorities to consider more detailed affordable workspace policies '*in light of local evidence of need and viability*'. The Mayor may have to provide further guidance on what 'local evidence' may mean in the context of affordable workspace if the draft policy is to avoid the above and other unintended consequences.

Our client concludes that for this policy and the policy before (E2 Low cost business space), the market is responding to providing for a range of office requirements through the rise of co-working and serviced offices across London already. The Ramadus report for the GLA on Small Offices and Mixed Useⁱ concluded there was enough small office space available and at an affordable price to match the level of demand. Therefore, they seek clarification for why Policy E2 and E3 are needed in the new London Plan.

Policy E5: Strategic Industrial Locations (SIL)

The principle to retaining the Borough's supply of designated employment land is broadly supported by our client. However, given the significant pressure from Central Government and the GLA to increase residential/mixed use developments and the inflexibility that the draft plan provides to release business space, this objective may be difficult to achieve.

Our client considers that the Mayor needs to take into account the dramatic uplift in the number of new homes needed to be built in London as set out not only in the draft plan but the higher number in the recent MHCLG consultation *Planning for the right homes in the right places*. If the national consultation proposals are enforced, it would mean a huge increase in the amount of homes needed to be planned for within London. Given the increased need for housing land, our client does not see why London needs to continue to protect all SIL some of which can be redeveloped and provided in more suitable locations outside of London, particularly when other policies such as air quality are considered.

Policy HC5: Supporting London's culture and creative industries

Our client is fully supportive of the Mayor promoting the continued growth of London's diverse cultural facilities and creative industries. Thriving towns and cities need a vibrant mix of places and activities and London's cultural facilities and creative industries contribute significantly to London's economic output.

Whilst it is for local authorities to decide the precise mix of buildings in terms of uses, the development sector plays a vital role in delivering the great places which enable London's culture and creative industries to thrive.

Policy E9: Retail, markets and hot food takeaways

Our client strongly backs the proposal to support retail development in town centres and supports policy E9 (alongside policies SD6-SD9). Whilst concerns regarding the proliferation of hot food takeaways are understood, these uses should be preferred to vacant shop units, which become

magnates for anti-social behaviour. A5 occupiers located within our client's site are of a high standard and the management of such operators is essential.

Our client supports criterion 7 of the policy which seeks to support the "range of London's markets, including street markets, covered markets, specialist and farmers' markets, complementing other measures to improve their management, enhance their offer and contribute to the vitality of town centres...". Our client's ambition is to provide a diverse mix of markets within their site and they welcome the Mayors support.

Our client supports criterion 8 of the policy which seeks to "manage existing edge of centre and out of centre retail (and leisure) by encouraging comprehensive redevelopment for a diverse mix of uses ... to realise their full potential for housing intensification, reducing car use and dependency". Our client considers existing edge of centre retail parks an excellent resource for providing brownfield redevelopment in sustainable locations.

Policy E10: Visitor infrastructure

Our client supports this policy in particular criterion B. which states "*the special characteristics of major clusters of visitor attractions and the diversity of cultural infrastructure in all parts of London should be conserved, enhanced and promoted*". Our client's site currently provides extensive visitor attractions and is increasing this provision through mean time and permanent uses whilst providing the necessary infrastructure to improve the site as a visitor destination.

Policy HC6: Supporting the night-time economy

Our client supports 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.

Our client welcomes the Mayor's commitment to promoting London as a 24-hour global city with the recently introduced Night Tube as a key step in unlocking the growth potential of London's night time economy and bringing its night-time infrastructure up to international standards.

Whilst the development sector does not play a direct role in shaping the night-time economy in London, it does play a crucial role in building the vibrant places that will help these activities thrive.

Policy G1: Green infrastructure

Our client welcomes the comprehensive focus on green infrastructure, sustainability, and associated environmental best practice within the draft plan. They also welcome the future review and update of existing Supplementary Planning Guidance on the All-London Green Grid. They would however suggest a cautious and considered approach to policy that green infrastructure should comprise an integral element of development as opposed to an 'add-on'. Our client welcomes the intention to promote green infrastructure across the city, but 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.

Policy G4: Local green and open space

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.

It is acknowledged within the draft plan that London faces some significant challenges in providing the appropriate amount and standard of development to address growing need. It must therefore be recognised that if policies relating to the protection and enhancement of green/open space are to be strengthened, there must be a necessary shift in the densities delivered and the best use of suitable development sites. Within London's finite land area, in order to house a growing number of residents, businesses, and social infrastructure whilst hitting a target of making '50 per cent of London green by 2050' densities must be maximised and innovation promoted on suitable sites.

Policy G5: Urban greening

Our client is encouraged by the many measures within the draft plan that seek to improve London's green and sustainable infrastructure. However, they feel that the possible outcomes of this draft policy have not been fully considered.

The evidence base for this policy (as outlined in The GLA's Urban Greening Factor for London 2017 Report) tests the Urban Greening Factor (UGF) formula on two residential and one non-residential case study. With the breadth of uses and building types within London including hotels, industrial, retail, and mixed-use properties, our client does not believe that the UGF formula and target outputs have been robustly assessed. They also believe that the quantum of certain 'types' needed to satisfy the UGF target scores may be difficult to achieve, particularly on constrained/specialist sites and when considering other sustainability measures (e.g. PV on roof tops) that may have to be incorporated in a development.

Our client would therefore ask that the UGF (developed as a guideline for LPAs) is either retested and the draft policy revised, or that it is closely monitored to assess its success alongside the viability of the urban greening 'types' proposed. They would also welcome some clarity around the desired outcomes of this policy and whether the requirements are intended to maximise the quantum, or maximise the quality, of urban greening provisions. There is very little evidence or testing of this policy and when taken along with all other policy requirements it is a significant burden upon development proposals.

Policy SI1: Improving air quality

Our client acknowledges the significant role that the built environment will play in minimising and mitigating the impacts of development on air quality. This is of course alongside the significant mitigation that will be required within the transport sector. To this end, the increased focus on addressing and reducing London's air quality issues through a general requirement would be reasonable. Policy SI1 makes reference to a requirement for large-scale development areas and developments subject to Environmental Impact Assessments to propose methods of achieving an Air Quality Positive approach. This target will likely prove impossible. With a commitment to optimising densities within areas such as transport hubs, the likely impacts of external air quality on internal readings may increase and proximity of new development to sources of pollution will narrow respectively. Furthermore, the increased density of development in certain areas and requirements for complex engineering solutions may limit the scope to include measures that positively impact air quality. Strategically this policy will be extremely difficult to achieve and is another element of policy emerging from the plan that will likely reduce the viability and deliverability of development in London.

In addition, our client would express some concern over the viability analysis conducted in relation to Policy SI1. The *London Plan Viability Study Technical Report (Dec 2017)* states that the associated costs have been tested; however, no evidence is available for these costs. They suggest that additional analysis is conducted across the strengthening of policies relating to the provision of Sustainable Infrastructure.

Policy T1: Strategic Approach to Transport

Our client welcomes the London Plan's commitment to providing a strategic approach to transport particularly in respect of making 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 and impacts on local communities is reduced.

Our client broadly supports the shift away from car use, but this policy will only succeed if efficient alternatives are put in place which gives Londoners real choice over using their cars. Public transport, such as the tube and the bus network should continue to be invested in but must also remain affordable to all those wishing to use it. Emphasis on safety is critical to give Londoners greater confidence in cycling on London's roads and investment on improving street environments will make walking over car use more attractive to those who wish to do so.

Policy T6.2: Office/ Policy T6.3: Retail Parking

Our client is pleased that the mayor is seeking to make the most efficient use of land. However, before specifying minimal parking spaces in Outer London Opportunity Areas, adequate transport infrastructure and provision for future funding needs to be in place to these areas, particularly in Outer London.

Policy T6.4: Hotel and Leisure Uses Parking/ Policy T6.5: Non-residential disabled persons parking

Our client is encouraged that the Mayor has included provision for disabled persons parking, taxis, coaches, deliveries and servicing. The policy specifies that *"all operational parking must provide infrastructure for electric or other Ultra-Low Emission vehicles"*, which they support; however, they would request this provision is included within the viability of developments as the infrastructure costs associated can be significant. Before minimal parking is adopted, adequate transport infrastructure must be in place.

Policy T7: Freight and servicing

Our client supports the Mayor's policy on freight and servicing, however, as with other areas with the plan, it will take time for these policies to bed in. In order for the policies to work for all our client would like to work with the Mayor to make sure this policy works for our client's site and Londoners and make sure that there is no short-term ramifications when adopting the policy.

This document is submitted by WYG Planning and forms the representations of a WYG Planning client delivering a large mixed use Build to Rent ("BtR") led development in North West London, to the Draft London Plan - The Spatial Development Strategy For Greater London Public Consultation.
