

09th December 2016

A City for All Londoners
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Dear Sir/Madam,

**A CITY FOR ALL LONDONERS CONSULTATION RESPONSE ON BEHALF OF
BISHOPSGATE GOODS YARD REGENERATION LIMITED**

These representations are submitted on behalf of Bishopsgate Goods Yard Regeneration Limited ('BGYRL'), a 50/50 joint venture between Hammerson plc and Ballymore, in relation to the 'City for all Londoners' document dated October 2016.

BGYRL jointly own the rights to develop Bishopsgate Goods Yard which is the largest development site in the City Fringe Opportunity Area. In 2010, together with Tower Hamlets and Hackney, the Greater London Authority published Interim Planning Guidance for the site that provides a framework for the future comprehensive development of the site and acts as a material consideration in determining future planning applications. The nature and extent of the Guidance document emphasises the strategic importance of the site and explains the various opportunities and challenges associated with its redevelopment.

A planning application for the comprehensive regeneration of the site was submitted to LB Tower Hamlets and LB Hackney in 2014 which broadly comprise approximately 1,400 residential units and 100,000 sqm of non-residential floorspace. The planning application was called in by the Mayor of London in September 2015 and is currently being considered.

The opportunity is welcomed at this stage to respond to this consultation and actively support the positive approach the document takes in promoting growth and development in London.

REPRESENTATIONS

Our client considers the Mayor's 'A City for all Londoners' document to be a positive step for the further growth and development of London, that sets out a good basis upon which key principles, policies and designations can be developed to underpin a new London Plan.

Accommodating Growth



The direction of travel of the Mayor's key themes, such as 'good growth', will be key and there is a great deal of work to be done to inform the preparation of future London Plan policies. In particular, policies in relation to the delivery of housing, creation of employment, unlocking the potential of public land, and the optimisation of strategic development opportunities at key transport nodes will be vital to London's growth and the success of a new London Plan.

Our client welcomes the Mayor's intent to meet as much of the city's growth demands within London through high density development located within highly accessible locations, well served by existing or planned transport interchanges. BGYRL believes that highly accessible sites have the ability to greatly assist in meeting ambitious housing targets through the use of well-designed and dense development for new housing and the delivery of new economic/business opportunities.

The Mayor notes within the document that he will continue to accelerate development of different kinds in over 40 Opportunity Areas and in many more intensification Areas. This objective is strongly supported by our client as these areas are key to delivering the housing required to meet current and future demand.

The term 'good growth' is used within the document and alludes to the provision of mixed developments with a range of amenities of all types in accessible locations; embedding cultural objectives into regeneration interventions and taller buildings in appropriate locations. These aspects of good growth are supported by our client. The Bishopsgate Goods Yard redevelopment represents a pertinent example of 'good growth' as it provides substantial development on a highly accessible site which will deliver new housing, a mix of commercial floorspace, active frontages and a significant number of new jobs in the local area.

Housing

The document notes that the Mayor will be working towards a target of 50% of new homes built across the city to be affordable. As no details have been provided within the document, our client requests further information around how the Mayor will seek to implement a policy requirement of 50% without having a detrimental impact on the delivery of new housing.

Further evidence is requested on whether a 50% affordable housing target is achievable in the current climate when developments are finding it increasingly difficult to achieve a 30-35% provision. The document notes that the 50% target will be achieved through a new approach to viability that sets out more clearly the contribution that development should make. The proposed approach to affordable housing provision, as set out in the document, should be consistent with that set out in the GLA 'Homes for Londoners' Draft Affordable Housing and Viability SPG (November 2016).

Economy

The document notes that the Mayor will seek for new commercial development to include affordable business space in line with different and changing business demands. "Affordable business space" is not defined within the document so it is uncertain at what percentage under market levels is considered affordable. Further, the term 'affordable' is flexible in this regard as it can relate to rent, lease length and



size of the accommodation provided. It is not clear from the document how affordable business space is defined and whether it is applied generically across London or within specific areas. Further clarity is requested on this matter.

Zero Carbon

The document notes that London will be carbon free by 2050. Although this target is supported by our client, no details have been provided within the document as to how this will be achieved and what impact this will have on new developments. Therefore, further information on this matter is requested.

Public Space

The document notes that tall buildings will continue to play a role in the future of London, provided that they can add value to the existing community. This is strongly supported by our client as tall buildings provide the opportunity to deliver additional housing along with greater benefits to the local community. Further information is requested on how tall buildings will be controlled through policy and whether they will be restricted to geographical areas or will be considered on a site by site basis.

We look forward to receiving confirmation that these representations have been received. Should you have any queries or require any further information, please contact Dean Jordan or Julian Shirley of this office.

Yours faithfully,

DP9 Ltd