

British Property Federation

1. The BPF represents the commercial real estate sector – an industry with a market value of £1,662bn and which contributed more than £94bn to the economy in 2014. We promote the interests of those with a stake in the UK's built environment to government, and our membership comprises a broad range of real estate owners, managers, developers and supporters. Their investments help drive the UK's economic success; provide essential infrastructure and improve society by creating great places where people can live and work.
2. The BPF welcomes the publication of the Mayor's draft London Plan. The plan certainly represents a significant change from its predecessors in terms of its breadth, new policy mechanisms and scale of ambition for the capital.
3. We welcome the plan's aim to reduce inequality and plan for growth in a way that is environmentally, economically and socially sustainable. We are supportive of the Mayor's Good Growth Policies including making the best use of land, delivering the homes that Londoners need and growing a good economy.
4. We welcome the opportunity to respond to the draft London Plan. We respond to the plan chronologically by considering each policy chapter by chapter. In some sections of our response we have grouped related policies together when commenting. We also include a general comments section which sets out our initial thoughts on the plan in its entirety as well as what we believe are notable omissions from the document.

General comments

5. This is certainly a very ambitious London Plan in terms of the scope of its policies and targets. Whilst the BPF welcomes the ambition of the plan and its focus on delivery, we do also have some areas of concern:
6. Although we are supportive of the general aims of the plan set out in the Mayor's good growth chapter, we would argue that there is a question over its implementation. In many areas the Mayor has set ambitious targets for growth but has not provided himself, the London boroughs or prospective developers with the necessary tools to deliver them. This point is extremely pertinent in relation to the mayor's ambitious housing targets.
7. We would argue that some of the plan's policies appear to be contrary to one another in terms of their objectives. For instance, we would argue that the Mayor's policies towards design are fundamentally at odds with the policy on optimising density.
8. In addition, we note that there are a number of key omissions within the Mayor's good growth chapter. These include any incentives to encourage developers to build and the crucial issues of transport and infrastructure have largely been ignored here. A further notable omission is any significant reference in policy terms to daylight/sunlight considerations.

9. We have concerns regarding the GLA's viability appraisal which underpins the financial soundness of the plan. We are particularly concerned about the cumulative impact of the draft policies on development viability, which could make development harder to deliver and, in some cases, disincentivise landowners from releasing land to the market and discourage developers from carrying out development. We note that London First have undertaken a detailed review of the viability evidence base of the London Plan. The BPF endorses London First's concerns regarding the methodology, costs, values and extent of information on which the viability evidence is based and agree that a significant proportion of new developments will not be able to fully satisfy emerging policy requirements whilst remaining financially viable.
10. We welcome the opportunity to provide our detailed comments in relation to the specific draft policies within the plan. These have been provided in the remainder of this submission.

Chapter 1: Planning London's Future

Policy GG1 Building strong and inclusive communities

11. We welcome the mayor's emphasis on the crucial role town centres play in the social, civic, cultural and economic lives of Londoners. Successful high streets and town centres are often viewed as a vital social centre for communities. They can be the engine for economic growth through the empowerment of local businesses and bring life to locations that could otherwise be inhospitable, for example through creating a vibrant night time economy. We would argue that a focus should be on different uses, in addition to retail, such as commercial, small and medium workspaces, social infrastructure and leisure.
12. It is encouraging that the Mayor recognises the role new buildings can play in enhancing neighbourhoods. A tailored approach can make sure that development is effectively contributing to place-making and improving the overall quality of a place.

Policy GG2 Making the best use of land

13. We are encouraged by the Mayor's commitment to creating high-density mixed-use places that make the best use of land. The policy's emphasis on the need to prioritise the development of opportunity areas and brownfield land as well as maximise the potential of sites around transport hubs and in town centres is also welcome. However, we believe this policy could go further still and have previously called for the establishment of 'station development zones' to ensure intensification is undertaken in an appropriate manner.
14. If London is to meet its requirements for housing at the rate required, there is a need for a land use strategy that embraces all possible sources of land. Whilst the draft plan recognises the need to explore the use of public land to support additional homes, there is no reference to the 'Domesday Book' of public land identified by the London Land Commission. We would encourage the Mayor to set out a clearer policy

framework which will enable this surplus public land to be brought forward for development sooner.

15. We will provide more detail on this point in subsequent sections as well as set out our position on the Green Belt in our response to Chapter 7 G2.

GG3 Creating a Healthy City

16. The emphasis placed on health and wellbeing as a key outcome from the capital city's continued growth is welcomed as an integral part of creating sustainable places. Further detail is however needed on how this will be implemented in an integrated and coordinated way. The built environment undoubtedly plays a central role in the health of Londoners, however a joined-up approach to improving wellbeing is required, with both public and private sector working together to achieve this goal. Whilst the development industry plays an important role in creating a healthy and sustainable built environment, communities stretch beyond the parameters of the buildings and the spaces surrounding them, in which people live, work, and relax. In some circumstances, this means that providing the requisite infrastructure to encourage healthy lifestyles lies beyond the remit and capabilities of an applicant or developer. Where this is the case, we therefore encourage the provision of measures to encourage local authorities to plan and deliver the required health-related infrastructure in line with the timescales associated with development projects. This should also apply across local authority boundaries to further encourage a joined-up approach and could take the form of joint reviews into infrastructure funding and delivery. One such study was undertaken into the Upper Lee Valley Opportunity Area in 2015¹.
17. Whilst we acknowledge that the health and lifestyle-related impacts of proposed development should be considered as part of all planning decisions, further clarity is sought on the following statement within the draft plan – '*Use the Healthy Streets Approach to prioritise health in all planning decisions*'. Whilst the Healthy Streets Approach set out in the draft plan is a step in the right direction; as with all new policy, the potential impacts of this initiative on the logistical and financial viability of development proposals must be carefully considered. Namely, if the Healthy Streets Approach is to become a policy consideration, some consistency will need to be provided across local authorities, particularly with regard to policies and guidance around car parking provision and car usage. Whilst the Mayor's emphasis on reducing the dominance of private vehicles is wholly welcome, there remains a discord between the aspirations of the GLA and many local authorities (particularly Outer London boroughs) when it comes to reducing car use and ownership. Consideration should also be given to the extent of which tangible improvements can be made as part of a development proposal.
18. We are encouraged that the Mayor is acknowledging the need to plan for improved access to green space as a central aspect of creating a healthy city. Green spaces and new green infrastructure are important components of creating great places. We

¹ Steer Davies Gleave et al. (2015). Upper Lee Valley Development Infrastructure Study - <https://goo.gl/rmgPXW>

would encourage the Mayor and his team to engage with the BPF's recently launched [Great Places Campaign](#) launched in October 2017. The campaign seeks to bring the real estate sector together to discuss and eventually achieve the provision of quality spaces, homes, workspaces, and neighbourhoods. Green space and green infrastructure can and will play an important role in this aspiration. Through round table discussions, large-scale industry events, associated materials, and collaboration with local and central government we hope to help London achieve and understanding of what a great place looks and feels like.

GG4 Delivering the homes that Londoners need

19. We are pleased to see that the issue of housing remains at the top of the Mayor's agenda and his commitment to increasing housing supply in London is hugely welcome. The draft London Plan (LP) is an important step in helping to provide Londoners with decent and affordable homes to live in and provides an excellent framework to help deliver the homes that are needed. We are particularly pleased to see that the delivery of homes is not seen as independent from the places where they are built, and that good and well-designed quality accommodation can hugely contribute to a sense of community and place.
20. We are encouraged to see that the LP acknowledges that London cannot be treated as a homogenous housing market and for delivery of housing to be successful, a local approach is required and working closely with the London boroughs will ensure that delivery is targeted and appropriate for that area. Furthermore, we very much welcome the approach of using all means available to provide homes; the development of brownfield land and use of small sites will be key. We have long-supported the idea that much more could be made of land in and adjacent to existing town centres; development here should be encouraged wherever feasible to provide truly mixed-use communities.
21. The Mayor's target of 65,000 new homes a year for the next 20 years is certainly ambitious and using all the tools available to support delivery will be paramount. A multi-tenure approach must be part of this target; Build to Rent and raising housing standards more generally in the private rented sector will both have a significant part to play.

GG5 Growing a Good Economy

22. The Mayor's commitment to supporting the delivery of wider public benefits, such as affordable housing and an increase in physical and social infrastructure, is encouraging. We would however ask that funding provisions and infrastructure plans are in place for initiatives that provide transport (and other infrastructure) to newly built homes, to enable the growth of strong economies in local areas around London. A wealth of empirical research and academic studiesⁱ – including the UK government's Eddington Studyⁱⁱ – shows a strong correlation between transport and economic activity. There is consensus that increased transport links can positively affect the rate of growth in GDP and the generation of trade and foreign direct investmentⁱⁱⁱ. Research by the Foundation for Integrated Transport (Transport for New Homes)^{iv} examined the

relationship between car dependency in urban and rural areas, and the capacity to invoke successful communities with high employment, amenities, health and wellbeing. This qualitative study found a correlation between car dependent developments and communities with a lack of economic prosperity. This suggests that for local communities to maximise their economic potential, better public transport links from central London to and between developing urban and rural areas in outer and greater London is required.

23. We are encouraged by the Mayor's commitment to ensuring that London is a global leader in innovation and research, which should maintain and grow a strong economy for the capital. To ensure that these commitments are achieved, any endeavour to reduce the number of international students being allowed to study in the UK must be halted. London hosts many world class universities, which contribute directly (e.g. employment) and indirectly (e.g. provision of skills) to the UK economy, so making sure that these institutions have the capacity to flourish is imperative to London retaining its prosperous economy. In 2013/14 there were 67,405 international students enrolled at London universities, 18% of the total student population in London, and despite the fall in the number of domestic students enrolling into London universities over the last five years, international student increased by 2% (+1,530 students) in 2016.^v London's international students bring a net benefit of £2.3 billion per annum to Britain's economy (primarily through fees and accommodation), equating to around £34,122 per student^{vi}, and representing 39% of the total fee income of London's universities.^{vii} Furthermore, having international students in London improves Britain's business influence. PwC found that international students who study in London are 60% more likely to do business with the UK because of studying there.^{viii} Therefore, international students are likely to form long-term ties with London, thus helping to strengthen its business and economic influence around the world.
24. We are encouraged that the Mayor is committed to supporting London's rich heritage and cultural assets. There are 19,000 listed historic buildings in London, which play an increasingly central role in the delivery of a range of public benefits, including education, economic development e.g. via the tourism industry, sustainable growth, urban and rural regeneration, repopulation of inner-city areas and cultural development. These buildings can act as assets in deprived areas to become new focal points for regeneration efforts^{ix}. The London Plan must ensure that conservation-led and 'heritage at risk' policies promote and do not obstruct the growth of creative industries (for example in the yet-to-be defined Creative Enterprise Zones and Cultural Quarters), London's night-time economy or business innovation.

GG6 Increasing efficiency and resilience

25. The draft plan recognises the importance of Good Growth and the opportunity to maximise efficiency and sustainability, whilst ensuring that a strategic approach to development aids the resilience and safety of the city. A well-planned and resilient city is crucial to its continued success and the BPF welcomes this focus, particularly with regard to climate change, a commitment to becoming a zero-carbon city by 2050, and fire safety considerations.

26. A great deal of work has been done and continues to be undertaken by the real estate industry to ensure that the future operation and growth of the capital city are carried out in a sustainable manner. It is however noted that although great strides are being made in energy efficiency, building performance and associated levels of emissions relating to development projects, there remain significant challenges around existing real estate stock and continued best practice over the course of a building's life-time. These challenges need to be recognised in the plan; in order to assist and promote the efficiency of buildings in the long-term, the BPF produced and published an [Aftercare Guide](#) in November 2017, to help provide constructive advice to developers, owners, and tenants.
27. We welcome the ambition to move London towards becoming a zero-carbon city by 2050, however we have reservations around the 10 per cent and 15 per cent efficiency targets for domestic and non-domestic buildings, in particular the 15 per cent target for non-domestic uses. We do not believe that the deliverability of this target has been fully tested. Our full comments on this issue are detailed in our response to Policy SI2.
28. We support the Mayor's plans to ensure London's safety and resilience in relation to emergencies, natural hazards and fire safety. However, we recommend that both national government and the GLA ensure that security provisions and initiatives are employed consistently and properly at a local level. Our full comments on these issues are detailed in our responses to Policies D10 and D11.

Chapter 2: Spatial Development Patterns

Policy SD2 Collaboration in the Wider South East

29. The BPF have long-called for more effective co-operation between the Mayor and the wider South East (WSE) local authorities. The draft London Plan rightly recognises that the effects of London's housing and labour markets and their related multiplier effects extend far beyond the capital's administrative boundaries, making co-operation and collaboration a clear necessity. The Mayor's aim to work with the WSE to find solutions to 'shared strategic concerns' appears to be a step in the right direction.
30. However, there is an argument that Policies SD2 and SD3 could go further in terms of promoting greater collaboration between Greater London and the WSE. The plan states that relationships with neighbouring authorities will be managed through a 'non-statutory strategic structure' with the Mayor interested in working with 'willing' partners beyond London. The Federation have previously called for greater incentives from central government for WSE authorities to contribute towards meeting London's housing need and generally a more robust approach towards satisfying the duty to cooperate. Greater clarity is therefore needed from both central government and the Mayor in this area if effective cross-boundary collaboration is to become a reality.

Policy SD4 The Central Activities Zone (CAZ), Policy SD1 Opportunity Areas

31. A positive aspect of the draft plan is its innovative approach towards spatial planning. The recognition of the need to plan for growth in different locations within the city through the revised approach to opportunity areas, the acknowledgment of the unique international standing of the CAZ and the introduction of growth corridors based on existing and planned infrastructure are all welcome.
32. However, we would argue that there is a need for more specific strategic guidance on the opportunity areas. The plan should be more proactive in terms of setting out what should be built/delivered at particular locations rather than a more restrictive approach in policy terms.
33. The link between infrastructure improvement and unlocking land for development is a fundamental thread which runs through this section of the draft plan. However, we note that a key message from para. 2.1.11 is that where development proposals are emerging, and transport investment is not yet fully secured, delivery will need to be phased so as to not have an unacceptable level of impact on existing infrastructure.
34. Therefore, to fully unlock the potential for growth and development, there is a need for major infrastructure projects – and in particular Crossrail 2 – to be committed to by central government and the Mayor. We would urge the Mayor to continue lobbying central government so appropriate funding can be agreed.
35. We note the seven growth corridors with strategic transport improvements within London (Crossrail 2, the Bakerloo Line Extension and the Elizabeth Line), and the series of Opportunity Areas that are affected most by each infrastructure improvement. The overall success of the Mayor's spatial growth policy is therefore highly dependent on this infrastructure going ahead.

Policy SD5 Offices, other strategic functions and residential development in the CAZ

36. We are encouraged by the Mayor actively prioritising office space in the CAZ. It is vital that London has the required amount and type of office space which is suitable for any type of business from small start-ups to larger, more established businesses.

SD6 Town centres, SD7 Town centre network and SD8 Town Centres: development principles and Development Plan Documents

37. We support a town centre place making policy approach that is sustainable, connected and adaptable to the changing nature of the high street. The draft plan recognises the changing role of town centres and the pressure that online shopping has placed on their ability to function in their traditional shop-based format, therefore we are encouraged by the plan's commitment to adapt. The draft plan encourages adaption towards innovative ways of retailing, accommodating new space where there is a demand, managing the transition of surplus retail space to other uses such as intensive mixed-use, and ensuring that there is not a surfeit of empty space on the high street

by supporting flexibility for temporary or 'meanwhile' uses of vacant properties. We endorse these policy initiatives.

38. We support residential development in town centres, including homes for smaller households, Build to Rent, older people's housing, and student accommodation, so as to adapt to the new dynamic of high streets. We would advise that new homes can for example be located above retail stores and commercial uses, to ensure that town centre footfall does not decline; residential use of empty spaces should also be considered as a suitable measure to ensure that town centres do not become blighted by declining occupancy. We are encouraged that the draft plan states that town centres with new housing developments should be well-connected through public transport infrastructure, cycling and walking; ensuring that town centre residential developments are well-connected is vital for the local economy². These policy provisions should give flexibility for local authorities to plan town centres to make best use of space and facilities, to create sustainable locations with active day and night time economies. However, we acknowledge that there also needs to be a balance between housing and commercial use of land. Successful high streets and town centres are often seen as vital social centres for communities, meaning that retail, amenities, offices, leisure, entertainment, culture, tourism and hotel industries must be encouraged to remain/ locate on the high street if they are to be in good shape – a mix of uses, including new homes - is key.
39. High street primary and secondary areas may well need to be reduced back towards the core (of the town centre) to achieve a stronger and better managed town centre overall. This may require significant restructuring and therefore it is imperative that local authorities, communities and businesses remain at the heart of this process, to seek to ensure that each town centre is a thriving social hub of the local area.

SD9 Town Centres: Local Partnerships and Implementation

40. Local authorities are operating in a time of reduced resources, meaning development plan policies will need to be strongly supported by the private sector if they are to achieve implementation. Therefore, we are pleased that the draft plan encourages more engagement between local authorities and the private sector and would advise that both need to become more receptive to the demands of each other and ensure that improving the town centre is their absolute priority.

SD10 Strategic and local regeneration

41. We welcome the continuity in policy to encourage spatial planning at a local level and support the call for all stakeholders to operate in a collaborative way, through pooling resources and creating partnerships. We would also encourage the GLA to work with the BPF to facilitate greater and more consistent collaboration between the public and private sectors. The Mayor's office can aid this effort through supporting and

² See response for GG5 Growing a Good Economy.

facilitating the work we are doing to bring local authorities and private sector organisations together to discuss and debate productive partnerships. We have held successful workshops with local authorities outside London (in Derby, Milton Keynes, and Southampton to date), and will be looking to arrange similar workshops to include local authorities in London.

42. Whilst we acknowledge the importance of London boroughs utilising their local knowledge and that of their communities to identify Local Areas of Regeneration, we believe the London Plan should be more robust in its prescription of strategic spatial planning. 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 a clear framework to for the growth agenda.
43. We would also encourage local authorities to proactively engage with the real estate industry in their plan making process and when formulating Opportunity Area Planning Frameworks. BPF members and real estate practitioners are able and willing to offer expertise and working experience to help deliver the best outcomes for regeneration. The cumulative lessons learnt by an industry with a market value of 1,662bn, that contributes £95.6bn GVA to the national economy each year, can inform future actions and help to address the spatial inequalities and causes of deprivation that still exist within London.
44. We acknowledge the importance of creating Great Places alongside the specific development projects that contribute to the built environment and we welcome the focus on protecting and promoting places and spaces that are valued by local communities. Central to this aspiration is relevant stakeholders making a coordinated effort, whether it be in the quality of design and architecture, or the delivery of supporting infrastructure. We launched our [BPF Great Places Campaign](#) in October 2017 and would encourage the Mayor and his office to engage with us in furthering the impact of our campaign.

Chapter 3: Design

D1 London's form and characteristics

45. Although we acknowledge and welcome policies that seek to ensure quality and sensitive design in light of expected high levels of growth, the draft policy may be at odds with some of the wider aspirations of the draft plan. Policy D1, B 1) states that development design should *'respond to local context delivering buildings and spaces that are... of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions.'* Whilst we acknowledge the importance of delivering growth in a manner that respects and improves on London's existing character, there are successful examples of developments within London that have successfully challenged the existing identity and character of the areas in which they are located, and in turn optimised density. Some of London's most iconic landmark buildings were, at the time of their planning and delivery, highly innovative in their

vision and concept, rather than simply relating to their existing context. This has been the case both in scale and design. We would therefore encourage a greater level of clarity within the plan with reference to the relationship between optimising densities on London's finite land supply and the scope for innovative design solutions, while taking into account considerations around the existing form and proportions of such localities. We are concerned that the current set of design policies may restrict the delivery of the quantitative targets that the Mayor has identified.

D2 Delivering Good Design

46. The real estate industry strives for excellence in the design and delivery of new development and we welcome the acknowledgment that design should be considered in line with ensuring the most efficient use of (limited) land, in order to optimise the use of development sites. To this end we would encourage the Mayor to strengthen plan policies around optimising density and the appropriateness of tall buildings in suitable locations, as an incentive for applicants to innovate in design terms in order to deliver higher density.
47. We would also encourage the Mayor to consider including clearer and more specific design policies within the plan. By providing clearer guidance on design and best practice in this regard, those tasked with delivering development project will be armed with the right tools to build at optimised densities.
48. Checks and balances within the public policy and decision-making spheres play a crucial role in ensuring quality of product and best practice in design. With regard to Policy D2 F, design reviews to date have not always been an ideal embodiment of this aspiration. In order to provide a productive and consistent tool for regulating design quality, design review must be consistent across local authorities. This has not always been the case to date, and we would encourage the Mayor to reconsider or strengthen policy to this effect. Applications at all scales of development are subject to review by local authority planning and (where in-post) urban design officers, reflected by continued evolution, review and scheme re-design by professional architects and relevant experts within the associated project teams. Design is therefore a key consideration from the outset of any development proposal. Design work is often carried out extensively before pre-application discussions with a local authority and therefore the timely (i.e. early) use of design review mechanisms is important in relation to ensuring a productive planning process. Some of the professionals that sit on the respective panels have previously highlighted the inconsistency of design review mechanisms and have urged that planning officers should be more proactive in requiring such reviews to be undertaken at an earlier stage. Delaying the first design review can be obstructive to design evolution and delay next steps in the planning process. We would therefore encourage the Mayor to reassess the timing of implementation of these reviews, to improve their effectiveness and reconsider the associated design policies to be stronger, which will help guide a consistent design review process.
49. We would welcome further consideration of Policy D2 H 4) which encourages local authorities to implement architect retention clauses in legal agreements 'where appropriate'. We believe that it is indeed important to promote the highest standards

of design and to ensure that these are upheld beyond the planning stage and into project delivery. We do however believe that retention clauses may result in some unintended consequences and we would encourage different mechanisms to be used in aid of upholding design standards, whilst allowing the flexibility for developers to consider commercial viability and to work with their preferred architects in the construction phase. This would be the preferred approach, as there are a number of unknowns and harmful consequences that such a restriction could lead to/ have. An example would be where a developer purchases a development site with planning permission and an associated s106 retention clause is in place. The purchaser would not be able to build out and deliver this using their own trusted architect - tried and tested working relationships often produce positive results – without seeking to renegotiate the s106 with the local planning authority. Inevitably, this could delay implementation. We would therefore request that further thought is given to the mechanism by which local authorities ensure that design quality is upheld; the most appropriate means is via well-crafted planning conditions referring to drawings and plans for the submitted design, and other documents submitted as part of the application.

D3 Inclusive Design

50. We fully support the Mayor's proposed policy for encouraging inclusive design across London's built environment. Ensuring that new homes, offices, and other property types meet the needs of all Londoners is a crucial element in future-proofing development and ensuring that growth is delivered sustainably.

D4: Housing Quality and Standards

51. In response to the Mayor's draft Supplementary Planning Guidance, we welcomed the intention to allow for flexibility on space standards particularly in Build to Rent developments and we are pleased to see that the LP will build on those set out within the SPG guidance. Research that the BPF commissioned in 2017, *'Unlocking the benefits and potential of Build to Rent'*, revealed that a large number of local authorities implement policies which impose minimum space standards in new Build to Rent developments. These policies have been applied in order to ensure the quality of the units delivered and reduce the associated impacts of overcrowding, including harmful implications on mental and physical health. However, these policies, though commendable, are tenure-blind and ignore the key differences between Build to Rent developments and units developed for sale. Build to Rent developments contain additional common areas and services such as resident gyms, laundry rooms and communal lounges. 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.
52. The prescriptive nature of the space standards set out in table 3.1 could inhibit new and innovative forms of housing coming forward; the LP should therefore provide the scope for an exception for developments which demonstrate exemplary design, in order to mitigate against this potential outcome.

D5: Accessible Housing

53. We welcome the commitment in the draft LP to housing that can meet the diverse needs of Londoners. New-build must be accessible and adaptable for those less able and the elderly so that all Londoners, regardless of ability, have the homes that they need. We support the emphasis placed on the delivery of specialist/purpose-built housing models, to alleviate the pressures mounting on existing housing stock. The provision and delivery of specialist housing types and tenures, particularly those catering for the elderly population, can play a significant role in addressing some of the underlying trends within the housing market. There is an identified undersupply of housing for the elderly and as a matter of wider principle, more consideration could be given to a promotional policy for purpose-built and specialised housing solutions.

D6: Optimising Housing Density

54. We agree with the statements in the draft LP that for London to accommodate more growth, every development must make the most efficient use of land and we accept that this will mean building at higher density. However, communities will only accept such development if it is demonstrated that local services and infrastructure will be adequate to support the additional homes being delivered. Inadequate planning or funding of infrastructure, including school places, healthcare or leisure facilities, will inevitably create animosity towards proposed developments.
55. The draft LP rightly notes that the capacity of existing and future public transport services should be taken into consideration when determining the optimum density of a site and we would agree that development opportunities around existing transport nodes should be exploited to make the best use of existing/ enhanced transport infrastructure. The proximity of public transport will be particularly attractive to Build to Rent investors and prospective occupiers therefore those opportunities should be maximised.

D7 Public Realm

56. We fully support the Mayor's draft policy for helping to ensure that the city's public realm contributes to sustainable growth and to the wellbeing of its inhabitants. As we increasingly discuss higher densities in identified areas, the importance of vibrant and well-designed public realm becomes ever more significant. The nature of London's public realm is that it will often fall under the remit of both private and public responsibility. To this end, considerations around delivery, as well as ongoing management and maintenance, can be complex and we encourage the boroughs, the GLA and the private sector to work in collaboration to achieve their common goals. We also acknowledge that this collaboration includes engagement and dialogue between neighbouring land owners and local planning authorities when undertaking spatial planning, to ensure that development proposals/sites are not delivered in isolation and are connected for the benefit of public access and cohesion, and to create positive character.

D8 Tall Buildings

57. High density development and tall buildings can bring significant economic advantages to an area. Research undertaken for the BPF by economics and planning consultancy Colin Buchanan has shown that there are significant economic benefits from increasing the density of commercial development in suitable locations.^x High density employment clusters that are easily accessible by public transport create greater opportunities for business specialisation, knowledge spill-over, increased efficiency, access to larger labour markets and economies of scale. Clustering was found to make people more productive than the same jobs being spread further apart. And the scale of this productivity gain can be significant; a case study constructed by Colin Buchanan as part of this research suggests that relocating 80,000 jobs to accessible high-density locations would increase output by £206 million annually. Therefore, policies around tall buildings should reflect these benefits. It is not clear why with tall buildings, compared to any other type of development, boroughs should take account of their potential contribution to regeneration (D8.B.2).
58. Furthermore, while we welcome the draft plan's proposal to remove the density matrix approach in favour of 'optimising housing density' as increasing flexibility in increasing scale, there will be unintended consequences. This change reduces certainty and may convolute and lengthen the planning process for developing tall buildings, as there would be no fixed methodology for calculating whether a tall residential building could proceed in any one particular location.

D10 Safety, Security and Resilience to emergency

59. We support the Mayor's intentions to work with partners and ensure London's safety from emergencies such as fire, flood, weather, terrorism and related hazards. However, we recommend that central government is more proactive in ensuring that security provisions and initiatives are defined, supported and employed across local authority areas. One way of ensuring this approach would operate effectively would be to initiate a template of good practice for local security provision, consisting of a short explanation about the security initiative, a series of actions that those in the area should undertake and recommendations about how the area can recover from hazards, should they occur.

Policy D11 Fire safety

60. We would encourage the Mayor to await the results of the Hackitt Review before making changes within this policy area. A further layer of policy may have the unintended consequences of confusion and lack of clarity.

D12: Agent of Change

61. We support the Agent of Change principle and are aware that the Planning (Agent of Change) Bill is currently progressing through Parliament at the time of writing. Responsible developers will already be ensuring that disruption from noise into their developments is kept to a minimum and will be putting in place mitigation measures to safeguard against disruption. However, the Bill will ensure that there are no grey areas with regard to developer's obligations and we support a policy that is further clarified through legislation.
62. In respect of housing proposed to be developed near e.g. music venues, mitigation measures such as soundproofing will form part of that development and developers will work closely with local authorities and the local community to ensure there is consistent consultation throughout the development process to ensure local amenity is maintained. We have no desire to see the closure of theatres and other music or cultural venues and firmly believe that new residential development must co-exist, to maintain a vibrant place where people (new residents and the existing local community) want to live.

Chapter 4: Housing

Policy H1 Increasing housing supply

63. We support the ambitions in policy H1 to deliver 65,000 additional homes per annum in the capital and the allocation of individual housing targets to each of the London boroughs.
64. Policy H1 is then exploring a number of the ways in which housing delivery can be increased and the factors that London's boroughs should take into account.
65. It is not clear from the draft Plan how the Mayor's allocation of housing targets relates to the Government's new proposed standardised methodology for assessing objectively assessed need (OAN). We do not support exceptions to OAN.
66. In addition, failure to deliver a defined percentage of housing requirement over measured time periods will in the future incur a proposed list of measures to correct the deficit in delivery (the Housing White Paper's 'Housing Delivery Test'). It is not clear from draft policy H1, what the mayor is proposing to ensure there are measures in place that would come into play to address under-achievement of a Borough's housing requirements, and how the Housing Delivery Test would apply once it has been introduced nationally.

Policy H2 Small sites

67. We support the principle of the Mayor promoting housing delivery on small sites. Delivering homes on more small sites is however only one part of many measures. Delivery on small sites requires a selection of developers willing and able to develop

such sites. Some may be SME builders, but others may be housing associations, or individuals who will employ a builder. It is likely that all will require support if they are to target and achieve delivery on such sites. How the Mayor deploys social housing grant may also be critical to small site delivery.

Policy H3 Monitoring housing targets

68. We support the monitoring of housing targets.

We would question the distinction made in the draft policy, however, between:

Net non-self-contained accommodation for students and shared living schemes should count towards meeting housing targets on the basis of a 3:1 ratio, with three bedrooms being counted as a single home.

Net non-self-contained accommodation for older people (C2 use class) should count towards meeting housing targets on the basis of a 1:1 ratio, with each bedroom being counted as a single home.

Such a differentiation in treatment should at least be explained in the Plan, so that its rationale can be tested.

Policy H4 Meanwhile use

69. We support the policy. It seems eminently sensible to encourage temporary use of sites for housing, mindful of the considerations set out in the policy.

Policy H5 Delivering affordable housing

70. We would like to see some emphasis and recognition in policy H5 of the frequently competing needs of planning-related commitments that developers face having to make – not only in s106 obligations but via mayoral and borough community infrastructure levy (CIL). The decision as to whether a proposed development will qualify for the threshold approach route on application will sometimes not be one that the developer is able to make, if there are likely to be significant other planning obligations and CIL payments to be made. Greater emphasis could also be made in the policy on how developers and local authorities should prioritise in order 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 optimal type and amount of affordable housing can be delivered.

71. We also believe that land use swaps and affordable housing credits (AHCs) should be constructively used to help meet affordable housing policy requirements. The current system delays the delivery of affordable housing until "need" can be met by an affordable housing-generating development. An AHC system would enable sites that have been identified for affordable housing to be delivered as soon as possible.

72. This has been done, an example of which being the Wilton Plaza, Westminster which delivered 74 affordable units, 68 of which were granted the status of an AHC and were completed in May 2009. 25 units were allocated to the Wellington House development that completed in October 2012, and the remaining 43 were allocated in 2014 to Arundel Great Court (a scheme that is still yet to be fully constructed). Compared to the normal process for delivering affordable housing, the AHC mechanism enabled 25 units to be delivered 3.5 years early and arguably the remaining 43 would still not have been delivered.³
73. There have been other instances where developers have found a site capable of delivering off-site affordable housing but been unable to do so because they are not yet able to deliver that scheme that generates the requirement. However, with AHC, developers could proceed with its delivery knowing that costs could be offset the costs against: the generating scheme if it is undertaken; another scheme in the portfolio; or via a third party that has also generated the need for affordable housing.

Policy H6 Threshold approach to applications

74. The supporting text to Policy H6, paragraph 4.6.13 recognises that a different affordable housing threshold approach to residential planning applications may be appropriate for Opportunity Areas. We consider this to be essential given the very challenging nature of most Opportunity Areas and the priority to be afforded to the funding of infrastructure necessary to enable development to come forward. However, the approach taken by paragraph 4.6.13, as currently drafted, only envisages a 'flex' upwards – above 35% (or 50% in respect of public land). This is concerning, and we are uncertain of the logic of what is proposed. For Opportunity Areas, there ought to be the ability for a bespoke threshold to be set that responds to the specific viability considerations of individual Opportunity Areas, where this can be appropriately and robustly evidenced. For some Opportunity Areas, significant funding from development may be necessary in order to unlock and deliver required infrastructure improvements, especially in respect of transport infrastructure.
75. Delivery of new and improved transport (principally rail) infrastructure is necessary in order for the real potential of new Opportunity Areas to be realised, both in terms of maximising much needed new homes as well as jobs. Development will play a critical role in realising necessary funds for this infrastructure to be delivered. The need and priority for affordable housing is wholly appreciated and supported, but, clearly, there are also other priorities that must be balanced. The ability for the threshold affordable housing level to be 'flexed' accordingly, to respond to such a balance, is considered important and necessary for the effectiveness of the Draft London Plan.
76. We further believe that the threshold of 50% for public land is too high and stymie development projects and would not allow the development of affordable housing to come forward. Public land offers the greatest opportunity for the development of new homes, but the threshold set at 50% would counteract this.

³ Landsec

Policy H8 Monitoring of affordable housing

77. We support the policy.

Policy H9 Vacant building credit

78. We support the policy.

Policy H10 Redevelopment of existing housing and estate regeneration

79. We support the wording in the draft plan.

Policy H11 Ensuring the best use of stock

80. We think the policy wording in H11c could be stronger. Currently it reads:

Boroughs should take account of the impact on the housing stock of applications for homes to be used as holiday rentals for more than 90 days a year.

We would advocate a stronger policy that is along the lines of:

Where it is demonstrable that there will be no significant impact on housing supply, Boroughs should take a considered approach to approving planning applications for homes to be used as short term/holiday rentals for more than 90 days a year.

Policy H12 Housing size mix

81. We support 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.

82. 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.*”

83. If the Mayor is dissuading Boroughs from having unit mix-based policies, he should not be then being stipulating his own.

Policy H13 Build-to-Rent

84. We welcome 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 we support. There are some aspects, however, that we think could be improved.
85. We agree that a covenant of 15 years is applicable at the present time, but the exact term of the covenant should be left for individual local authorities to determine. However, the suggestion from the **Build to Rent** sector is that this figure will increase as the market matures. We think to make that assertion now is premature and that should be left to further development of the policy at a future time.
86. B6) asks that longer tenancies of three years or more are available to all tenants. We support that approach, but the draft policy goes on to stipulate that these should have break clauses for renters, which allow the tenant to end the tenancy with a month's notice any time after the first six months. Bearing in mind the longer tenancies being given, we do not think it is unreasonable for the landlord to ask for a slightly longer period of notice than would be the norm, and therefore any period up to three months' notice would be more appropriate.
87. Our 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 and will adversely impact the Residual Land Values for **Build to Rent** and will therefore make it uncompetitive with regards to land acquisition and pricing compared to Build for Sale. This economic advantage given to Build for Sale is in direct contradiction with aforementioned policies aiming to support the **Build to Rent** sector.
88. As a result, the LP policy is in danger of stifling London BTR development and at a time when there is strong and growing investment interest in BTR in other regional markets, and therefore diverting vital investment away from London. The LP policy indeed risks squandering what has been an advantage for London of having a well-developed BTR policy. Only politics can explain the evolution in the threshold approach to BTR. What was a policy in the preparation of the Housing SPG, which was to have a separate and specific threshold for BTR that was based on evidence, has become one based on a threshold that bears no relation to evidence.
89. We estimate, based on advice from our members, that there are very few **Build to Rent** developments in London that have, or could, deliver 35% affordable housing at the kinds of rents the Mayor prefers. If the Mayor has evidence to the contrary, then it should be made available as part of the Plan's evidence base.
90. Setting 35% affordable housing for the threshold approach to viability 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 for affordable housing in BTR developments then in the slow track process they will use that incorrect assessment as their opening negotiating position on viability. We would rather see a bespoke, worked-up **Build to Rent**

threshold and would be very willing to assist in its formulation.

91. Some work has been done in that respect by our members, In undertaking detailed financial modelling comparing generic and hypothetical yet realistic Build for Sale schemes and Build to Rent schemes in London at varying levels of affordable housing and discounts, it has shown that a Build for Sale scheme can pay 29.2% more for land than a Build to Rent scheme on a like-for-like basis (35% affordable housing, with a third of this being offered at 30%, 40% and 50% discount to market levels respectively). Therefore, Build to Rent can only compete against Build for Sale in two scenarios:
 - 35% of units as affordable homes at a 20% discount to market rent, or
 - 20% of units as affordable homes at varying discounts of 30%, 40% and 50% (one third each)⁴
92. The sector generally has a preference for the second of these approaches in the bullets above. It would prefer to deliver deeper discounts and cater for a variety of Londoner's incomes, than deliver more 'affordable' homes, but at a shallower discount.
93. It would be helpful to continue dialogue on this aspect of the plan over the coming months and we remain very willing to make our evidence available to the GLA so that a proper bespoke threshold approach to BTR can be developed.

H14 Supported and Specialist accommodation

94. We believe it is right that boroughs undertake assessments of the short and long-term accommodation requirements for different groups of people. As noted in our response to D5: Accessible Housing; accommodation must be as diverse as the Londoners it is seeking to house, to truly meet the needs of the capital. Existing accommodation options should be reviewed, and shortfalls identified; if available, current homes should be refurbished to a standard set against minimum criteria. The population of London is a transient and mobile one and as such, boroughs must work across their boundaries to meet their diverse needs.

H15 Specialist Older Persons Housing

95. We agree that there should be a stronger focus on specialist housing for older people. There is a lack of adequate housing serving older people in London and all of the UK, with many believing that they would downsize if suitable properties existed. This lack of suitable housing for older people has a clear impact on those lower down the housing ladder, with larger family homes owned and occupied by older people only becoming available when someone passes away. A Law Commission Report in 2017 '*Event Fees in Retirement Property*', concluded that increasing specialist retirement housing not only helps release properties further down the housing ladder but residents in retirement communities are less likely to feel isolated and are healthier,

⁴ Financial modelling undertaken by Grainger PLC

which in turn means less of a strain on healthcare providers and the NHS.

96. Clearly, there is significant demand for retirement properties which come with a number of significant benefits; the draft LP is right to broaden its focus to encompass those with a variety of care needs, including accommodation for those with dementia and nursing care. However, The Plan's definition of C2 is inappropriate for inclusion. The use class of any one development should be considered in terms of fact and degree in each case, as there are many different operational models in the market.
97. Recent Government initiatives have failed to recognise the importance of delivering housing that meets the needs of older people, choosing instead to focus on those of first-time buyers. The Housing White Paper indicates a welcome move from Government to focus policy and guidance on increasing and encouraging supply, and it is therefore critical that emerging planning policy in London supports the delivery of homes of all types and tenures. Boroughs have an important role to play in helping to identify where the need is greatest and can help encourage the development of specialist accommodation in their areas.

H17 Purpose-built student accommodation

98. We are pleased to see that the substantial contribution London's universities make to the economy is recognised in the draft plan. The sector contributes directly (through fees, accommodation and student spend), indirectly (e.g. provision of skills) and retrospectively (e.g. employment) to the economy and requires clear policy guidance to encourage Boroughs to positively plan for this sector. We are therefore pleased that the housing requirements of students in London have been recognised as an important part of meeting London's overall housing need. We believe that new student schemes should be built close to good transport links across all London boroughs, including new emerging locations, to match student numbers and lessen the pressure on the capital's residential housing stock.
99. The following policy however, we believe, needs amending:

"the student accommodation must either be operated directly by a higher education institution or the development must have an undertaking in place from initial occupation, to provide housing for students at one or more specified higher education institutions" (194)
100. As stated above, London has insufficient purpose-built student housing in comparison with its student numbers, which puts significant pressure on the capital's residential housing stock. We are therefore concerned that this draft policy will particularly limit access to purpose-built accommodation for students attending smaller institutions. The higher education system is dynamic, constantly changing and is no longer just focused on large, well-established universities. The number of smaller institutions is growing, they rarely have housing of their own and they lack the financial resources and expertise to invest the significant time required to partner with developers in respect of a specific purpose-built student housing development. Furthermore, developers are unlikely to engage with these smaller providers through the planning process if underwrite levels amount to only low numbers of beds. Conversely, smaller PBSA operators will not have the capacity to develop schemes appropriate for large Higher Education Institutes. The draft plan could therefore severely restrict the

number of students from smaller institutions living in purpose-built student housing, putting more pressure on the conventional residential housing stock. Fundamentally, this draft policy is too narrow, biased towards large HEIs and large suppliers and is likely to diminish the emergence of new purpose-built student housing schemes.

101. A further issue with this policy is that it does not explain what constitutes a nomination agreement. We would welcome clarity about whether this is an agreement that local authorities determine at the local level. Higher education providers may be reluctant to make binding arrangements prior to planning approval given the subsequent changes to design and massing that can occur later in the process. The draft plan is also silent on length of term and what percentage of beds within a scheme constitute an “undertaking”. Accounting treatment considerations force HEIs, who need agreements to be off balance sheet, to introduce break clauses or room hand-back provisions, which enable them to mitigate demand risk and comply with Higher Education Funding Council rules on lease liabilities. It is therefore essential that a lower test than a full legal undertaking, pre-planning, is applied and that PBSA owners and operators do not breach planning if such agreements naturally lapse or demand from an institution reduces and agreements need renegotiating later.

102. A final issue with this policy concerns VAT. There are two ways in which student accommodation can qualify for VAT reliefs. One is to ensure the accommodation qualifies as ‘dwellings’, however there are conditions for this, particularly around the terms of planning, which envisage accommodation being for students at specified HEIs. The alternative route to VAT relief is to ensure that the accommodation is intended for at least 95% student use. However, as PBSA relies on substantial non-student use during student summer vacations for financial viability purposes (as acknowledged in the plan- 4.17.12), this exemption is not feasible. In HMRC’s current view, the policy will be understood that accommodation which links to specified HEIs will be unable to qualify for zero-rating VAT reliefs (and other reliefs) as ‘dwellings’. This is likely to result in a substantial increase in development costs, by up to 20%, and therefore private sector developers are likely to pursue other opportunities, perhaps in other cities. We would suggest that the GLA needs to engage with HMRC on this issue, and that any comfort that HMRC can offer needs to be published.

103. The following policy also needs to be reviewed in our view:

“a proportion (35 per cent) of bedrooms in PBSA are required to be affordable at this income level” (195)

104. The categorisation of ‘affordable’ here needs addressing. It is unclear why affordability is being linked to personal ‘income’ rather than to a percentage of market rent. Student income is largely subject to government policy and not the economic realities of developing student accommodation in London.

105. While the concept of affordable student housing is of course laudable, we are concerned that such a policy will further constrain the development of private PBSA in London and as such have a negative impact on the total provision of student accommodation, which is still very scarce in the capital. Imposing affordability quotas on developers is likely to lead to the supply of PBSA being constrained, which will apply further pressure to the capital’s wider housing stock. A market without such restrictions will encourage an increased supply of PBSA, which will lead to a wider

range of products being created to satisfy a range of location, price and quality needs. We see that rent levels will ultimately respond to supply with downward pressure created by a healthy pipeline of new development. Rents, and more especially, tenancy agreement lengths, have respectively flattened and shortened in markets such as Wembley where PBSA competition is now significant.

106. We ask the GLA to clarify whether the 35% affordability threshold is intended to apply to the intensification of existing student schemes as well as the development of new schemes. From a planning perspective, intensifying existing schemes provides a valuable, potential fast-track to growing PBSA in London and should be excluded from affordability requirements. This will avoid these schemes having potentially very small and difficult to administer percentages of affordable units.
107. We also ask the GLA to clarify why the affordable housing threshold is now applicable on all PBSA, even when nominations have been agreed. The current London Plan only seeks affordable housing where the nomination is not agreed. We would like to know what has changed in the short time since the last update to the London Plan and what evidence base has been provided which means that this element of the policy is now justified.
108. The two policies specified above, especially when combined, are likely to severely constrict the development of PBSA at a time when London's student numbers significantly outweigh the number of purpose-built student units, and while London's wider housing landscape is going through a shortage. Meanwhile, and by way of contrast, Nottingham City Council has encouraged PBSA investment in the city centre to match their student demand, lessen pressure on traditional houses being converted to HMOs and to ultimately improve their housing provision⁵. This has led to the creation of 1787 PBSA bed spaces over the last three years, freeing up many existing homes for the wider residential market, improving affordability and easing their housing shortage^{xi}. The development of PBSA has also improved Nottingham's economy as it has led to more students living in the city centre who in turn have supported struggling shops and businesses^{xii}. Nottingham serves as a good case study and exemplifies a strategy which local authorities in London could adopt, via a London Plan policy, to ease their own housing shortages and regenerate areas.
109. We believe, schemes in London, which can demonstrate that they can directly link with a higher education provider, should have the 35% affordability requirement removed.
110. We believe that where 100% of the rooms in the student development meet the affordability criteria, there should be no need for a nomination agreement with a university.
111. We are pleased that the Plan acknowledges the need for temporary alternative summer use of accommodation. However, this should be drawn as widely as possible, allowing student accommodation to be used for many types of occupation. This would allow the accommodation to potentially help reduce overall cost of term time rent and

⁵ The number of full-time students living in the City is 46,000 (an increase of nearly 20,000 since 2001) with students making up 15.0% of the City's population. (*Nottingham City land and planning policies. Sustainable, Inclusive and Mixed Communities. Background Paper. September 2013*)

thus meet affordability requirements. The current Plan wording is too restrictive and could result in empty rooms in the summer and therefore increased term time rents.

112. The plans specify that new PBSA developments should double their bicycle allocation to one space per room, and while the notion is laudable, the demand is not there to justify the significant burden this will have on development. Strong evidence shows that the vast number of spaces in basement areas are not being used^{xiii} and many operators are in discussion with local authorities about re-purposing such spaces. Covered cycle storage is created at the expense of other amenities that are in much better demand, and thus there should be no increase in requirement. We also believe the Plan should encourage innovative spatial alternatives to the simple “one hoop per resident” policy such as double-racking, folding bike allocations and free membership of cycle hire schemes. These latter two, for example, should permit the developer to remove the requirement altogether.

113. We would also ask that PBSA is clearly defined in the plans. This is to avoid confusion about how large the building should be and how council tax gets categorised.

H18 Large-scale purpose-built shared living

114. We are pleased that the Plan recognises purpose-built professionally-managed shared living as a possible way to meet housing need in London and are 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.

115. However, as with purpose-built student accommodation, affordable housing policy on such units needs to take account of their specific development economics, not some notional target, otherwise support is somewhat totemic.

116. A 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) is unrealistic and takes no account of the fact that space is being saved to deliver greater affordability.

a. Alternative forms of living can have a very positive impact on the housing market by providing “place over space” at a price which is lower than full size units in that location. There are large and growing parts of society that do not qualify for state social housing and cannot afford to buy, or even rent a standard sized home in central London. Therefore, an increasing number of Londoners are required to share accommodation in the private rented sector. This model offers a solution to this issue, and simultaneously seeks to improve the standard of shared accommodation in prime locations, which can often be of poor quality and badly managed.

b. Large-scale purpose-built shared living also offers a “socially active living” service. Research by the Mental Health Foundation found that 60% of 18 to 34-year-olds report regular feelings of loneliness in big cities^{xiv}. Purpose-built shared living that incorporates communal space, encourages more social interaction between residents.

117. We understand the importance of space standards; however, these should also reflect innovation and the choices that Londoners want to make in putting place above space. This policy acknowledges 'sui generis non-self-contained' housing, however seems to avoid acknowledging self-contained sui generis housing. Research stipulates that from 2010 to 2015, the share of households in the UK that were renting increased by 21.6 percent - a substantially higher rate than second placed Ireland with growth of 12.3 percent and Germany - known for their rented culture - at 2.7 percent^{xv}. The increasing demand for rented accommodation needs to be matched by supply to ensure that no more price inflation on the current private rented sector. There have been endeavours to satiate this increased demand; since 2014 there's been an increase of 172 per cent in 'micro homes' in the UK and last year a record 8,000 were built, with many of these schemes relatively 'compact'.^{xvi} However, by failing to acknowledge self-contained sui generis housing, the London Plan is constraining the delivery of more homes via other more innovative housing options, at a time when London is undergoing a severe housing shortage.
118. Ultimately, we feel that the policies stipulated above may halt the development of a form of living accommodation that has many benefits in terms of helping to address London's vast housing need and individuals' choices. We urge the Mayor to reconsider the policies in H18.

Chapter 5: Social Infrastructure

S1 Developing London's social infrastructure

119. We are encouraged that the mayor recognises how social infrastructure is essential in developing strong and inclusive communities, desirability of place and a good quality of life. We are therefore supportive of the policy to ensure that new developments have their social infrastructure needs met, and that they are facilitated by easily accessible transport links. However, and as stated above, the provision of social infrastructure, particularly in relation to major developments, is a complicated process. It requires an understanding of how services are provided and by whom, a knowledge of the likely needs of the new community and the impact on the existing community. Therefore, a great deal of collaborative working is required between local authorities and the local community to ensure that the right blend of social infrastructure services is available to development in the right locations and at the right time.

S2 Health and social care facilities

120. Delivering the health and social care infrastructure necessary to enhance and ensure the wellbeing of Londoners is crucial in enabling the sustainable delivery of the required new homes, and commercial premises. We welcome the call for a closer working relationship between boroughs, Clinical Commissioning Groups (CCGs), and the NHS to ensure efficiency in the use of estates and facilities to provide an improved

quality of care. Requirements for the aforementioned stakeholders to regularly assess the need for health and social care facilities locally and sub-regionally, we believe, will help to ensure that the required facilities are delivered in line with an ever-changing built environment and demographic and population pressures. Increased levels of engagement between boroughs, CCGs and the NHS will ensure a joined-up approach to the provision of such facilities. Applicants and developers will therefore feel more confident in the identified need, potential location, and deliverability of such facilities. We believe that collaboration between the public and private sectors will play an important role in the delivery of projects across all tenures in relation to retirement living, care homes, and housing-with-care.

121. We welcome the call for development proposals that seek to provide high quality new and enhanced facilities to be supported. We would ask the Mayor to extend this level of support to specialist older persons' housing and housing-with-care, by reconsidering the requirement for associated affordable housing contributions. There exists a significant undersupply of specialist older persons housing within London and the UK. The timely and amplified delivery of such housing can play an important role in reducing the strain on health and social care facilities particularly in terms of primary care and the burden on the NHS. Recently published research by the ILC-UK into *International Lessons for the Housing-with-Care Sector*, identifies a potential reduced cost to the NHS of £1115 per person per year⁶. It should also be noted, as explained above, that increased provision of specialist housing for older persons whether inclusive of care facilities or broader retirement living models can help alleviate the existing pressure on family housing stock that is occupied by those that wish to downsize.
122. We would draw the Mayor's attention to the recently published report produced by the Communities and Local Government Select Committee on *Housing for Older People*⁷, which calls for a national strategy for the provision of associated housing models. The report recommends that the complications of enabling housing for older people should be addressed through revisions to the NPPF and through consideration in the upcoming Green Paper on Social Care. We believe that such priority should also be promoted through the London Plan.
123. Whilst better integrated forward planning and collaboration between boroughs, CCGs and the NHS are greatly welcomed, some work remains to be done in addressing the current separation between commissioners and associated land ownership. The result of such separation is that the aspirations of the respective landowners is at times divergent from the desire for commissioners to drive commissioning intentions and subsequent good growth.

⁶ International Longevity Centre (2018). Stronger Foundations: International Lessons for the Housing-with-Care Sector in the UK - <https://goo.gl/2K4aWM>

⁷ Communities and Local Government Select Committee (2018). Housing for Older People - <https://goo.gl/kbaHvx>

S6 Public toilets

124. We support the policy proposal that large-scale commercial developments, such as shops, leisure facilities and large areas of public realm, should provide and secure the future management of free publicly-accessible toilets. We also agree that facilities should be suitable 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.

Chapter 6: Economy

E1 Offices

125. We are pleased that the importance of office space across London is acknowledged by the Mayor and are encouraged by the commitment to ensure that employment and industrial space is located in the right areas and with the right transport infrastructure to support it. We would also recommend that similar industries be further encouraged to located near each other; as articulated in D8 Tall Buildings, this can lead to opportunities for business specialisation, knowledge spill over, increased efficiency, access to larger labour markets and economies of scale^{xvii}. This was found to make people more productive; a case study constructed by Colin Buchanan found that relocating 80,000 jobs to accessible high-density locations would increase output by £206 million annually^{xviii}. Ultimately, it is vital that London contains the right amount and types of office space and that they are laid out in a manner to maximise the productivity of any type of business, from start-ups to more established enterprises.

E2 Low-cost business space

126. We agree 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 it 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 other 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 - additional design measures will 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.

127. Another unintended consequence of this draft policy is that businesses who could qualify for existing low-cost space may have their chances of securing new premises lessened, as existing landlords could become very wary of leasing them space when a new development is being conceived. This may also lead to these small businesses being served notice to leave buildings as a precautionary measure (by landlords) against developers potentially having to re-provide new floorspace for similar users.

128. This policy appears to be applied to second and tertiary space that has a lower

specification than prime space (para 6.2.2). However, para 6.2.3 of the draft Plan outlines that the conversion from office to residential under Permitted Development rights has had an impact on secondary space in the fringes of central London and Article 4 exemptions have restricted Permitted Development rights across central London therefore we would question the role of draft Policy E2 and suggest its deletion, or at the very least, that it does not apply to the CAZ.

129. Nevertheless, if the Mayor wishes to retain this draft policy, it should be made less prescriptive: 2,500sq m for new B1 is too small a area, moreover there should be a focus on larger regeneration projects where there is the capacity to cross-subsidise lower value uses and where low-cost business space can better complement a building with a mix of uses.

E3 Affordable Workspace

130. While the concept of affordable workspace for a social, cultural, or economic development enterprise is laudable, the need for a London-wide policy on this is unclear as London boroughs already have the ability to ensure the delivery of affordable business space through planning obligations. Affordable workspace will usually be weighed against other competing priorities that a local authority wants to address via planning conditions and obligations. Often, other priorities such as social or affordable housing provisions and contributions towards infrastructure are preferred.
131. The implementation of this draft policy could also lead to unintended consequences. It could drive incumbent small businesses out of an area, as they struggle to compete with those enjoying preferential terms via the allocation of affordable workspace. One business's subsidised rent is another's unfair competition.
132. Subsidised units are likely to be assessed for business rates purposes based on rateable value rather than rent passing. This leads to a major unintended consequence as the total costs of occupancy (in the subsidised workspace) will become significantly higher than finding cheaper workspace at market rent.
133. This draft policy may 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 reduce the lending that the charities can secure to fund their activities.
134. We would also ask the Mayor to consider what implications the cumulative viability impact of having to deliver affordable housing and affordable workspace across London (such as in Camden, Westminster and parts of Islington) will have on development. There is no clear evidence provided to substantiate this policy and we have concerns regarding how it would be decided who benefits and for how long, nor is there any indication of how it will be managed.
135. Nevertheless, should the policy be retained, we would advise that it be amended as follows:

- a. 'Affordable' be defined more clearly. Currently, it is defined very differently across boroughs and this confusion could add to the viability concerns and therefore constrain office development.
- b. The application of this policy depends on local circumstances and the viability of the development concerned.
- c. The policy be revised to ensure that landlords have the power to include a maximum timeframe that a business can occupy a subsidised space. Alternatively, the mayor could specify a maximum threshold after which a business is no longer eligible for the affordable space (to note- this would only work if there is a clear and uniform definition of affordable workspace). This will encourage all businesses to expand and grow, and not stifle their progress because of the enticement of cheaper rent.
- d. The mayor considers making retail units eligible for affordable workspace, the policy should not have discrepancies based on the operational nature of a business.

136. 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 as yet unknown unintended consequences.

137. We conclude that for this policy and the policy before (E2 Low cost business space), the market is already responding to providing for a range of office and other workspace requirements e.g. through the rise of co-working and serviced offices across London already in existence. The Ramadus report for the GLA on Small Offices and Mixed Use^{xix} concluded there was enough small office space available and at an affordable price to match the level of demand. Therefore, could we ask for clarification for why Policy E2 and E3 are needed in the new London Plan? Nevertheless, if the mayor persists with these policies, there should be an obligation to stipulate that they are permissive and designed to allow boroughs to develop their own local interpretation in local plans, and are therefore not to be applied directly in decision making without a local expression.

E4 Land for industry, logistics and services to support London's economic function

138. 'We welcome Policy E4 'Land for industry, logistics and services to support London's economic function' statement that provision should be made for 'land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure' and that 'The retention and provision of additional industrial capacity should be prioritised in locations that are accessible to the strategic road network and/or have potential for the transport of goods by rail and/or water transport'

139. We believe, however, that planning policy should go further and recognise that land along the river and along the main rail routes into London is a precious commodity and that, where it is - or can be - linked to the strategic road network for onward distribution, there should be a presumption in favour of transport and logistics use. By

definition, modal transfer from these low-carbon modes to (electrically-powered) road vehicles for final delivery can only take place along the key water and rail arteries.

E5 Strategic Industrial Locations (SIL)

140. We fully support the Mayor's policy on Strategic Industrial Locations. We would however add 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 LP 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, as such the Mayor needs to take account of the increased need for industrial space as each new home will create a need for distribution services located within easy reach of industrial land.

E6 Locally Significant Industrial Sites

141. We support the Mayor's policy for Locally Significant Industrial Sites.

E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function

142. We have concerns about the accuracy and relevance of the data the GLA's London Employment Sites Database Report, which has been used to calculate the 65% site density.

143. We recommend that the 65% plot ratio rule is reduced to 45% but also recognises that this figure could change subject to the following:

- a. Last mile delivery/parcel depots utilizing cross docks facilities
- b. Irregular or constrained plots
- c. 'Starter' units under 5,000 sq ft
- d. Specific operational needs of occupier for more bespoke facilities driven by changing operational processes, including the development of robotics and automation.

144. Whilst we recognise the principle of 'no net loss' approach, the draft policy does not take account that many old redundant factories or industrial schemes have incredibly high plot ratios, or in some cases are already multi-storey. We recommend that the policy is applied with flexibility in exceptional circumstances where the existing floorspace no longer meets the operational needs of industrial occupiers.

E8 Sector growth opportunities and clusters

145. We support the Mayor's policy.

Chapter 7: Heritage and Culture

Policy HC1 Heritage conservation and growth Policy HC2 World Heritage Sites Policy HC3 Strategic and Local Views Policy HC4 London View Management

146. We are encouraged that the Mayor recognises the vital role that heritage can play in contributing to the capital's ability to grow. In addition, the approach of considering heritage and culture together in one single chapter with the emphasis on their clear links and ability increase the economic, environmental and social value of London is welcome.

147. BPF members place significant value on the historic environment. Maintaining historic buildings in economic use, introducing new uses for heritage assets and integrating historic buildings within newer schemes all present opportunities for conservation and enhancement, together with new development, to work together and transform the built environment and public realm for communities.

Policy HC5 Supporting London's culture and creative industries

148. We are 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.

149. 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 HC6 Supporting the night-time economy

150. We support the Mayor's development of a vision for the night time economy of London. Successful cities need a vibrant mix of activities and the further promotion of night-time economic activities such as eating, drinking, entertainment, shopping and spectator sports will increase London's productivity, economic growth and social wellbeing.

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

152. 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.

Chapter 8: Green Infrastructure and Natural Environment

G1 Green infrastructure

153. We welcome the comprehensive focus on green infrastructure, sustainability, and associated environmental best practice within the draft plan. To this effect we also welcome the future review and update of existing Supplementary Planning Guidance on the All-London Green Grid. We 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'. We welcome 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 G2 London's Green Belt

154. The BPF has a long tradition of supporting brownfield-first policies. However, the Federation now recognises the need to take a strategic view on Green Belt policy, by making better use of transport corridors that pass through it.

155. In our view, the LP should encourage an independent (and apolitical, as much as possible) review of the role that the London Green Belt currently has (e.g. with regard to preserving openness and preventing sprawl), and the role it could potentially play in contributing to meet London's housing needs in appropriate locations. The starting point for any future Green Belt review should consider areas that relate closely to existing or future transport nodes that are of poor environmental quality.

156. At the very least we would argue that this policy should be amended so that it is consistent with the National Planning Policy Framework.

G3 Metropolitan Open Land

157. We note that the principles of national Green Belt policy (stated within the NPPF) correspondingly apply to Metropolitan Open Land (MOL). We therefore reinforce our stated position in relation to Policy G2. We advise that Metropolitan Open Land is subject to an independent (and apolitical) review of its role and how it could potentially contribute to helping meet London's acute housing needs.

158. We do however welcome the acknowledgement within Policy G3, C that there is scope for the alteration of boundaries associated with Metropolitan Open Land, and believe that such aspects of special planning will be important in addressing London's acute housing need.

G4 Local green and open space

159. 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.

160. 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.

G5 Urban greening

161. We are encouraged by the many measures within the draft plan that seek to improve London's green and sustainable infrastructure. Requirements around urban greening for all major developments could play an important role in increasing the city's resilience against climate change and improve air quality, biodiversity and the general health and wellbeing of its inhabitants. We broadly welcome the intent of this policy, however feel that the possible outcomes of this draft policy have not been fully considered.

162. 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, we do not believe that the UGF formula and target outputs have been robustly assessed. We 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.

163. We 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. We 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.

G7 Trees and Woodlands

164. We welcome the emphasis placed on maintaining and increasing the extent of London's 'urban forest'. Biodiversity and the natural environment are crucial to the sustainable growth of the city. We do however note that the tools used for natural capital accounting (assessing the value of natural infrastructure) are varied and diverse. In relation to Policy G7 part C, there is therefore a risk that local authorities

and developers may draw different conclusions regarding the 'value' of trees if different tools are utilised. This may cause undue confusion and we therefore suggest that research is undertaken, perhaps in the form of a report evidencing the value of trees, woodland, and green space on a case study basis, with a view to recommend a single tool or methodology for the sake of clarity.

Chapter 9: Sustainable Infrastructure

SI1 Improving air quality

165. We acknowledge 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 London's air quality issues through a general requirement for development to be Air Quality Neutral is welcome. This is an aspiration that although challenging, will ensure a reasonable target to work towards. However, 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 prove challenging. 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. Further, 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. We therefore ask that policy SI1, A, 3) be reworded to the following effect:

*"The Development of large-scale redevelopment areas, such as Opportunity Areas and those subject to an Environmental Impact Assessment should propose methods of achieving an Air Quality Positive approach through the new development **where possible, subject to technical guidance and feasibility**. All other development should be at least Air Quality Neutral.*

166. In addition, we 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. We suggest that additional analysis is conducted across the strengthening of policies relating to the provision of Sustainable Infrastructure.

167. We would also encourage a greater level of consistency across the policies relating to sustainable infrastructure. Gas powered CHP should for instance be discouraged as a carbon reduction technology given the likely associated reductions in air quality.

SI2 Minimising Greenhouse gas emissions

168. We welcome the target of London becoming a zero-carbon city by 2050 and note the extension of this target to major non-residential developments. This is again an ambitious target and further clarification is needed with regard to the inclusion of construction emissions in the zero-carbon definition. Further, owing to lifecycle carbon

assessment methodologies being incomplete, we believe that including embodied carbon in the zero carbon targets would be premature without a suitable and clear methodology in place.

169. The requirement for a minimum improvement of 35% through on-site measures and the targets of 10 per cent and 15 per cent (residential/non-residential respectively) regulated emissions reduction through energy efficiency measures have elicited some concern. The target for a minimum 35% improvement through on-site measures is supported in its intent but its execution may be flawed. The 35% target requires some qualification as there is currently an industry campaign to precipitate review of Part L of the Building Regulations; we would not wish to see reduced ambition in a Part L Review owing to concern that whatever might be agreed in the context of a Part L Review might lead to undeliverable targets in London. Therefore, it may be sensible to create a sliding scale such that the London target adjusts relative to any uplift in Part L that may occur during the shelf life of this London Plan. Further, the language in the London Plan needs to be clarified; we assume the intention is that energy efficiency measures need to account for a minimum of 10 per cent for residential buildings and 15 per cent for non-residential buildings' energy savings over and above Part L. We presume:

- a. That these targets include energy demand reduction measures as well as measures that improve the efficiency of the use of energy by fabric and services.
- b. That measures to improve the non-fabric and services efficiency of the building (i.e. those energy consumption sources that might not be covered by Part L, but which would be covered by a Display Energy Certificate) would be covered. This distinction was a feature of the learnings from the previous Mayor's Business Energy Challenge.
- c. That if a developer wished to, they would be at liberty to deliver the whole London Plan target via energy efficiency and demand reduction measures if they wish.

Even allowing for the above, it is vital to be conscious of the fact that previous research undertaken by AECOM has identified that we are reaching the limits of fabric and service efficiency measures and that future carbon reductions and energy demand reduction measures will need to be found elsewhere. It is also noted that the AECOM report (GLA energy efficiency target) which forms part of the respective evidence base states that not all building types will be able to meet the target and that due consideration should be given to this in planning terms.

Therefore, it may be necessary to operate a comply or explain principle if the Mayor is minded to adopt the 35% improvement target in any case, since there will be buildings that will not be able to meet the target as the GLA's own commissioned research indicates. We would ask that this qualification is represented in the wording of the policy and its supporting guidance.

170. We welcome the slight shift in policy around mitigating any shortfall in reaching on-site zero-carbon targets through the option of cash in lieu contributions as well as off-site provisions (as outlined in SI2, C, 1/2). We would however ask that careful consideration is given to the rate at which offset prices are set and that they should be fair and reasonable given experience of existing schemes. It should also be noted that not all local authorities hold the same capacity and understanding of the renewable

energy potential of their area, which may cause delays in delivery. The flexibility in this policy will however help to ensure the immediate delivery of such carbon offsetting initiatives and will encourage applicants with multiple assets to assess and identify improvements across their portfolios where appropriate. Further guidance is however requested in relation to the parameters of the off-site provisions. For example, will there be a requirement that these are located in London? Do these off-site provisions have to be a building? We would also ask that transparency is offered by way of the end use of cash in lieu contributions, in part to enable clarity as to whether the offsets can be credited to the owner or occupier.

171. Whilst the general targets for the reduction of on-site emissions are supported, we have some concerns over the language and methodology used in the definition of zero carbon buildings. We would welcome some confirmation that emissions related to embodied carbon, construction activities, and unregulated consumption are not included in the zero-carbon definition. The inclusion of such elements is largely related to when zero carbon buildings need to be delivered by. To this effect we would not oppose an all-encompassing zero carbon definition but would request clear guidance on the requisite timescales.
172. In addition, the costs of achieving zero carbon non-domestic buildings through offsetting payments are likely to be substantial in some cases. Whilst the plan's viability study tests the application of the proposed zero carbon standard to the non-domestic sector, there remains concern that the number of case studies used as a basis to test the additional offset costs proposed are too few, and we recommend that further analysis is undertaken to establish a more robust evidence base. We have seen evidenced calculations that estimate significant increases in zero carbon offset payments as a result of the applied new London Plan guidance.
173. Guidance under paragraph 9.2.10 of the plan provides a significant amount of detail in prescribing the minimum content of energy strategies. We believe that the draft plan should set out the broader objectives and aspirations in terms of energy considerations, whilst leaving the finer detail to be determined on a site by site basis, allowing greater flexibility in accordance with the latest technology and best practice. We therefore recommend that the language within this part of the plan be softened to further clarify that the composition is not mandatory.
174. Section 9.2.10 (h) of the draft plan has drawn interest from the real estate industry. Monitoring energy demand and carbon dioxide emission post-construction may provide a hugely valuable data set across building types and tenures, helping the industry better identify best practice and plan for innovation. Whilst the policy offers these benefits, the implementation of the policy is key to its success. BPF members have advised that difficulties may arise around the monitoring of such data in relation to the residential sector. Within the residential sector consumption data can be difficult to obtain due to ownership and protection rules, particularly around individual occupier's energy usage. We request that a clear and consistent criterion for reporting this data is established and that consideration is given to ease of accessibility.
175. The draft plan at section 9.2.10 (i) states a requirement for development proposals to exhibit how they have been future-proofed to achieve zero-carbon on-site emissions by 2050. Whilst the long-term thinking is encouraging, further information and supplementary guidance is requested as to what evidence and what extent of evidence

is needed to satisfy these criteria? As with many planning and regulatory issues the ever-changing nature of the market and policy environment pose difficulties for future-proofing. An alternative approach to this specific requirement would be to amend the draft plan to further encourage flexibility and adaptability of buildings. This could help to address issues around embodied carbon and energy, and to tackle future emissions and energy consumption levels through proactive measures at the relevant juncture.

Policy SI3 Energy Infrastructure

176. Whilst we support the intent of this policy, there are a number of issues that we believe need further thought. We believe that the Mayor's prioritisation of energy infrastructure may elicit some issues around carbon savings. Homes built to high energy efficiency standards (as specified in Policy SI2) will have low heating demand, reducing the potential for carbon savings through energy infrastructure. If a new dwelling has an annual heating bill of £350, the payback for the capital cost of energy infrastructure will be significantly longer than for older housing stock and the carbon saving much lower.
177. We also believe that there is a risk that Energy Service Companies who will want 40-year concessions to build and operate energy networks, will be reliant on gas fired technology which, whilst marginally cleaner than grid electricity today, will become relatively more carbon intensive in the short term as the grid is decarbonised. Whilst we recognise the policy intent of utilising other heat sources instead of fossil fuels, there is a concern that this will be technically difficult to implement and, in some instances, result in a fall back to gas fired CHP.
178. We would therefore request that Policy SI3 D is reworded to *'Major development proposals within Heat Network Priority Areas should have a communal heating system, where it is deemed appropriate to the development'*. And part 1) reworded to *'the heat source for the communal heating system should take into account the following options according to feasibility and viability.'*
179. Given the varying context, priorities, and challenges of individual development proposals it is important that the correct approach is taken in aid of delivering the lowest carbon outcome for a specific site. In light of the legal and technical challenges associated with this endeavour we recommend that policy SI3 should offer a range of heat options as opposed to imposing a hierarchy.

SI6 Digital Connectivity Infrastructure

180. We are pleased that the Mayor recognises the provision of digital infrastructure as fundamental for the proper functioning of development and are encouraged by his plans to achieve greater digital connectivity and ensure that sufficient space is available for future digital connectivity infrastructure. Businesses will always benefit from having an office with great internet provision, which is as crucial to their ability to work as having energy, water, and waste management. One strategy for ensuring new developments are equipped to meet businesses' internet demands is to reward developers who have designed a building with great connectivity with ease of getting planning permission. The easiest route for landlords and developers to demonstrate

that they have taken measures for great digital connectivity provision is to obtain a digital connectivity rating. As part of the digital connectivity rating process, the building's diverse physical infrastructure, power resiliency, and readiness to supply businesses with the internet provision they require should be taken into consideration.

181. To ensure that London has high-quality/world-class digital infrastructure government should pursue a full fibre to the premise strategy that encourages as much rollout of fibre as possible. London businesses need to employ fibre solutions and enhance its digital infrastructure to stop falling behind other countries; the UK is currently ranked 17th out of the 19 countries for access to full fibre connection. Installing fibre at the earliest opportunity reduces the risk of the building becoming obsolete as modern businesses require the speed and reliability of commercial fibre to be productive.
182. For businesses to truly benefit from fibre services, they should have access to multiple fibre providers, which reduces the cost of service and allows for back up connections to ensure resilience. To ensure businesses have access to multiple fibre options, the plan should focus on reducing internet providers' installation times to businesses where there is already fibre in the area, in addition to tackling issues with the lack of available fibre in London.
183. Faster installation times can be encouraged by the following measures:
 - a. From an infrastructure perspective, the placement of Universal Communication Chambers outside a building can greatly speed up the faster installation of new connections and reduces the disruption to business and damage to the public realm. This is done by removing the need to construct new penetrations to the building each time a new provider wishes to install services.
 - b. From a readiness perspective, The Standard Wayleave Agreement reduces delays to installing internet service by establishing proactive terms and conditions for the Landlord's rules for installing, maintaining, and removing telco equipment, thus streamlining the ability for new providers to supply service to the building.
 - c. For further readiness measures, the landlord can organise letters of intent from providers in the vicinity, indicating to businesses in the building that there are internet providers who are committed to providing service in the surrounding area.
184. It should be noted that because of the vast variance in the quality of digital connectivity being provided to businesses, the provision for digital connectivity should not be called "the fourth utility" - treating it as parallel to the fit out of energy, water, and waste management services. It is in businesses' best interests to understand which services they will require to meet their digital needs, especially as modern, growing businesses increasingly require the symmetrical speeds at 1Gbps that commercial fibre offers to support their business functions. One solution to prevent businesses from being priced out of fibre services is for the Government to provide funding for opex (not just capex) of leased line solutions.

Policy SI7 Reducing waste and supporting the circular economy

185. The draft policy around the reduction of waste and the circular economy is largely welcome. We do however express some concern that high-rise developments face greater difficulties recycling materials. We would welcome some additional guidance on how best to improve recycling rates in high-rise buildings.

SI12 Flood Risk management

186. We are pleased that the Mayor is seeking to manage flood risks from all sources and are pleased that greater engagement between the Environment Agency, the Lead Local Flood Authorities, local planning authorities, developers and infrastructure providers is being encouraged. The Mayor's commitment to flood risk management is underlined by his plan to undergo perpetual maintenance to ensure robust defense against flood threats and we are encouraged by this.

187. However, to ensure that flood risk management is as effective as it could be, Government should review the effectiveness of their coordination, resourcing and administration process in high-risk flooding areas. Possible ideas for managing flood risk in London include, the use of natural flooding deterrents, such as planting, in areas with the natural landscape to do this, improved on site attenuation where appropriate and encouraging more rainwater harvesting for flushing and irrigation. We would also ask that government provide those who work in the flood management sector with the platform to be a leading asset in flood management and ensure that they have incessant access to new research.

188. A key aspect of London's flood defense is the Thames Barrier and it is important a new Barrier is pursued with sufficient urgency, making contingency for land use that will service the barrier and working with the Environment Agency on funding.

Chapter 10: Transport

T1: Strategic Approach to Transport

189. We welcome the LP'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.

190. We broadly support the shift away from car use, but this policy will only succeed if efficient alternatives are put in place which give 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.

T2: Healthy Streets

191. The GLA's commitment to healthy streets is commendable and we are pleased to see that the policy is forming part of the wider LP. We firmly believe that the approach to creating healthy streets should be a combination of factors; reduced car use, better and improved transport provision and attractive and safe streets for people to roam and dwell in. Thoughtfully designed public realm is key and creating high-quality environments which Londoners wish to use and feel proud of will in itself bring a host of benefits not only to the areas that have been created but also to the Londoners using them.

192. Good planning and design will be critical to the creation of healthy streets and, again as mentioned previously in this response, boroughs will need to work across their boundaries to ensure that London is working as a whole city rather than a disparate set of areas with conflicting aims. Developers, architects and land owners will also have their parts to play through from the planning and design stages to implementation and the public private partnership working is something which we are strongly in favour of.

T6.1 Residential Parking

193. We welcome the commitment to ensure that new residential developments are provided with suitable parking provision and the associated infrastructure for electric or Ultra-Low Emission vehicles. Disabled parking should be provided for on all new developments and the bays located close to the relevant block entrance or lift core.

T6.2 Office and T6.3 Retail Parking

194. We are pleased that the Mayor is seeking to make the most efficient use of land. However, before specifying car-free areas in the centre of London and minimal parking spaces in Outer London Opportunity Areas, adequate transport infrastructure to these areas needs to be in place.

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

195. We are encouraged that the Mayor has included provisions for disabled persons parking, taxis, coaches, deliveries and servicing. This highlights that the Mayor is committed to providing parking for transport services and those that need easy mobility. Also, we are pleased that the plans specify that "all operational parking must provide infrastructure for electric or other Ultra-Low Emission vehicles", this underlines the Mayor's ambition to support innovation and environmentally friendly transport. However, before minimal parking is adopted, adequate transport infrastructure must be in place.

Policy T7 Freight and servicing

196. We support 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 we would like to work with the Mayor to make sure this policy works for our members and Londoners and make sure that there is no short-term ramifications when adopting the policy.

Policy T8 Aviation

197. We would argue that there is a definite need for additional runway capacity and urge the Mayor to work with government to find an urgent solution to this problem.

Policy T9 Funding Transport Infrastructure through Planning

198. We are pleased to see the Mayor championing further infrastructure development in London, including through Crossrail 2, in the new draft plan. We have publicly urged the UK Government to get behind Crossrail 2 and fully support the Mayor in his attempts to push this vital scheme forward.

199. However, we note that this section of the plan sets out that, if Crossrail 2 does not go ahead, monies collected from the MCIL2 will be used for other strategic infrastructure projects. Whilst we fully support the Mayor in his efforts to secure central government funding for Crossrail 2, in the meantime, we urge the Mayor to list the other forms of infrastructure options for the capital. We would also argue that the charging rates for MCIL 2 should be looked at again should the Mayor fail to secure the funding from UK Government.

Chapter 11: Funding the London Plan

Policy DF1 Delivery of the Plan and Planning Obligations

200. An ambitious London plan will require significant investment for the policies to take real effect. However, the structure of funding for public projects is complex, particularly in relation to transport infrastructure funding. Whilst the Mayor controls a variety of funding sources (including MCIL2 & business rate retention from 2018/19) for strategic infrastructure investment, a significant amount of funding will be necessary from central government. We therefore urge the Mayor to continue to lobby central government to provide the necessary funding for Crossrail 2 and other major strategic infrastructure projects. Only then will the London Plan be able to fully capitalise on the capital's potential for growth and greater housing delivery.

201. We note that this section of the plan also sets out a proposal for the GLA to share in

land value capture (LVC) from public assets. As LVC occurs in many different forms, the Federation does not have a blanket position in this area. However, we believe a critical consideration for all forms of LVC is whether it encourages overall productivity and growth. A LVC mechanism which stifles development activity and growth for the sake of tax take is unlikely to meet this outcome. We hope that this point will be taken into consideration by the Government, GLA and TFL Joint Task force which is set to explore this issue in more detail. We have recently submitted evidence to the HCLG Select Committee, which sets out our position further on LVC and is more specific on its various forms.

202. A further option for raising funds set out by the Mayor is to accept the London Finance Commission's recommendations for the full devolution of property taxes, business rates and stamp duty. The BPF supports the general principle of greater devolution of finances and decision-making powers to cities. We look forward to hearing more detail on this option before we comment further.

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- ⁱ Exhibited in http://www.londonfirst.co.uk/wp-content/uploads/2012/09/London_First_Connectivity_Commission_report3.pdf
- ⁱⁱ The Eddington Transport Study, HM Treasury/DfT, December 2006.
- ⁱⁱⁱ Cf. London's Place in the UK Economy, 2009-10, London School of Economics for the City of London Corporation; Press statement, 25 January 2011, City of London Corporation.
- ^{iv} <https://irp-cdn.multiscreensite.com/a16e1e13/files/uploaded/Newsletter2.pdf>
- ^v CBRE, *UK Student Accommodation Storylines: Applications, Affordability and Appetite from Investors*, September 2017, p.2
- ^{vi} *ibid.*, p.8
- ^{vii} *ibid.*, p.7
- ^{viii} PwC analysis & London First/PwC survey, <http://londonfirst.co.uk/wp-content/uploads/2015/05/London-Calling-report.pdf>, p.17
- ^{ix} Lichfield's analysis of ONS and Historic England data
- ^x *The economic impact of high density development and tall buildings in central business districts*, A report for the British Property Federation by Colin Buchanan and Partners (September 2008); http://www.ctbuh.org/Portals/0/People/WorkingGroups/Legal/LegalWG_BPF_Report.pdf
- ^{xi} Unipol Student Homes data, 15th December 2017
- ^{xii} <http://www.nottinghampost.com/news/nottingham-news/one-12-homes-classed-student-344296>
- ^{xiii} Unite Data- Appendix A; IQ survey finds a low level of bike usage with residents in their schemes.
- ^{xiv} https://www.mentalhealth.org.uk/sites/default/files/the_lonely_society_report.pdf
- ^{xv} Statista Limited Data, 26th February 2018
- ^{xvi} ^{xvi} <https://www.express.co.uk/life-style/property/844252/Housing-crisis-micro-homes-UK-house-building>
- ^{xvii} *The economic impact of high density development and tall buildings in central business districts*, A report for the British Property Federation by Colin Buchanan and Partners (September 2008); http://www.ctbuh.org/Portals/0/People/WorkingGroups/Legal/LegalWG_BPF_Report.pdf
- ^{xviii} *ibid.*
- ^{xix} Ramidus Consulting Limited, *Small offices and Mixed use in Central London*, Report for the Greater London Authority

Appendix A

	Total Beds	Bikes in Bike Store at 5am							Avg over 7 Days	Avg per Bed	DDA Students (last 5 years)	Blue Badge Holders
		01 Feb	02 Feb	03 Feb	04 Feb	05 Feb	06 / 02/	07 Feb				
Blithehale Court	304	12	15	6	4	12	5	10	9	3.01 %	1	0
East Central House	245	3	3	3	3	7	4	6	4	1.69 %	0	0
Olympic Way	699	23	23	23	25	21	20	19	22	3.15 %	1	0
Pacific Court	140	3	4	5	8	9	4	7	6	4.08 %	0	0
Quantum Court	130	5	6	5	6	5	5	5	5	4.07 %	2	0
Rahere Court	184	8	8	8	8	10	12	12	9	5.12 %	1	0
Sherren House	251	12	12	16	17	17	16	15	15	5.98 %	3	0
Student Living Heights	135	4	4	4	4	4	4	4	4	2.96 %	1	0
Sunlight Apartments	24	0	0	0	0	0	0	0	0	0.00 %	0	0
Bernard Myers House	123	25	20	18	19	23	23	23	22	17.54 %	1	0
Ewen Henderson Court	260	12	12	12	12	12	15	17	13	5.05 %	2	0
Julian Markham House	232	17	14	15	13	12	17	16	15	6.40 %	4	0
Moonraker Point	674	28	28	27	20	31	34	24	27	4.07 %	4	0
Sidney Webb House	453	41	37	37	38	39	31	35	37	8.14 %	2	0
Wellington Lodge	146	3	3	3	3	3	3	3	3	2.05 %	0	0

Beaumont Court	231	17	13	15	13	19	10	11	14	6.06 %	0	0
Elizabeth Croll House	101	2	2	2	2	2	2	2	2	1.98 %	2	0
Mary Brancker House	182	14	14	14	17	19	21	12	16	8.71 %	1	0
Piccadilly Court	209	0	0	0	0	0	0	0	0	0.00 %	0	0
Somerset Court	167	6	6	5	6	8	5	9	6	3.85 %	2	0
St Pancras Way	571	21	20	25	24	13	12	10	18	3.13 %	6	0
Stapleton House	862	23	18	41	31	12	16	18	23	2.64 %	1	0
Angel Lane	759	34	22	39	20	18	25	25	26	3.44 %	2	0
Emily Bowes Court	694	10	9	10	15	18	10	9	12	1.67 %	1	0
North Lodge	528	15	16	17	15	12	13	15	15	2.79 %	2	0
Station Court	224	3	3	3	3	3	3	3	3	1.34 %	0	0
Stratford One	999	35	34	35	30	32	38	45	36	3.56 %	2	0