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07 August 2015

Iceni/EU  
BY EMAIL

Dear Mr Johnson,

**MINOR ALTERATIONS TO THE LONDON PLAN – HOUSING STANDARDS**  
**DRAFT INTERIM HOUSING SUPPLEMENTARY GUIDANCE**

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We write further to our previous representations on behalf of Greystar LLP on 22 June 2015; wherein representations were provided in the context of broad support for the Mayor's intentions to increase both the quality and quantity of new housing delivered in London. These representations provided a summary of the optimal PRS model for Greystar.

As a recap, Section a) below summaries our original representations to the Draft Interim Housing SPG; whilst Section b) provides additional commentary to Draft Interim Housing SPG.

**a. Previous Representations**

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The Draft Interim Housing SPG continues the support contained within the London Plan and the London Housing Strategy for PRS as a model. In this respect, Greystar welcomes the recognition of the Mayor within the document Foreword that the housing market should respond innovatively to increase delivery. It recognises the significance of different housing models, including purpose built long term rent, in meeting need and accelerating delivery.

Paragraphs 3.1.22 to 3.1.31 of the Draft SPG are generally very supportive of PRS, and specifically highlights the benefits of purpose built long term private rent schemes, which is encouraging for PRS providers such as Greystar. Paragraph 3.1.31 confirms that 5,000 purpose-built long term private rent dwellings should be built per annum, which is supported.

Paragraph 3.1.25 specifically states that *'Local policies requiring a range of unit sizes could be applied flexibly to long term PRS units.... The standards in Part two of this SPG provide flexibility to consider innovative designs where they meet identified need and are of an exceptional standard.'*

For completeness, Greystar proposes a specific insertion into Table III confirming that flexibility will be applied to these housing standards in consideration of innovative designs where they meet identified need and are of an exceptional standard, as set out above.

Greystar supports Paragraph 3.1.29 of the Draft SPG which states that *'borough SHMAs should identify the future need for private rented sector housing.'* It is important that the SPG includes requirements that the identified need for PRS housing is translated and enshrined within each borough's Local Plan.

The recognition in Paragraph 4.4.40 that viability is an issue for PRS schemes due to its distinct economic model is significant. It is noted that a 'claw back' option is highlighted, however there is no

'one size fits all' mechanism, and, dependent on the site context, a clawback mechanism may not be appropriate.

Paragraphs 7.4.9 and 7.4.10 are supportive of the role of purpose-built, professionally managed PRS accommodation in contributing to London's housing supply. For the reasons set out previously in this letter, it is proposed that the SPG recognises the unique characteristics of PRS housing, and the requirements for the GLA and local boroughs to apply its policies in a flexible and supportive manner to these proposals.

## **b. Additional Representations**

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Our additional representations relate to Section 1.3 (Optimising Housing Potential) of the consultation document.

Whilst we welcome Paragraph 1.3.7 which highlights that the density matrix should be used as a starting point and a guide, we are concerned by the tone of the following paragraphs.

Para 1.3.8 states that development at densities outside of the density ranges '*will require particularly clear demonstration of exceptional circumstances*'. This position is supplemented by wording at Paragraph 1.3.9, which states that '*unless additional, significant reasons to justify exceeding the top of the appropriate [density] range can be demonstrated rigorously, proposals should normally be resisted*'; whilst Paragraph 1.3.10 indicates that local context circumstances should not be afforded more weight than public transport accessibility.

In this regard [density], we highlight London's inability to meet previous housing targets set out in the London Plan, and industry [development] concerns that exist about meeting the new housing targets set out in the Further Alterations to the London Plan (FALP) document, adopted in March 2015.

As worded, we are of the view that elevating density policy in this way will be counter-productive and counter-intuitive to the delivery of suitable and viable housing developments. As a consequence, we are of the view that such a prescriptive and inflexible policy will in effect make it more difficult for developers to bring sites forward; in particular sites which require substantial remediation and infrastructure works.

In addition, the shift in approach is even more concerning given the position on the density of mixed-use development sites outlined in Paragraphs 1.3.62 and 1.3.63. The approach outlined for density calculations reduces the area of the site (for calculation) down by the proportion of non-residential floorspace proposed. This approach in our opinion, needless creates density objections for high density mixed-use developments in all different sizes and types of development sites all across London.

Many Local Planning Authorities (LPA's) that positively support the mixed-use redevelopment of employment sites apply a 'no net loss' policy (i.e. existing employment floorspace must be replicated in any redevelopment proposal). In light of this, were planning decisions to be reached in accordance with the approach to mixed-use density calculation outlined in the draft SPG, there would be a significant reduction in the housing yield that could be delivered through this important form of housing development supply.

By way of example, urban brownfield sites where there is existing 100% plot coverage with two storeys of commercial floorspace and a good PTAL, sufficient to justify redevelopment for 4 storeys (mix of commercial and residential); the resultant effect the proposed density policy would be to halve the site area for the density calculation. This will potentially lead to conflict with the density matrix.

Therefore, to reduce the density matrix levels because a development contains commercial floorspace, makes no sense and is wholly inconsistent with the aim of the London Plan and National Government Policy to significant boost housing delivery. Far from optimising development sites, the current approach will lead to urban/brownfield sites failing to optimise their potential to deliver housing.

Further to the above representations, we also outline potential issues to the draft standards set out in Section 2.3 (Dwellings) and Annex 1 (Summary of the proposed changes to the quality and design standards); in particular we raise concerns relating to circulation space within developments. It is considered that the requirements set out in the draft SPG will in practice create and unnecessary overprovision of internal circulation space (i.e. lift cores), which in turn could adversely affect the viability of delivering high density PRS schemes.

By way of example we will confirm that the standards, if applied to a typical multi-storey development with 8 units per floor would need a disproportionately large number of escalators and cores to serve it. In comparison with the current standards in the US and mainland Europe, the SPG would require the provision of 500% more in comparison.

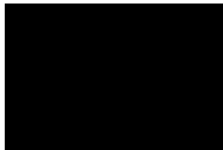
In addition, the SPG would require duplication of building services and management systems, which is contrary to the aims of sustainable design, and reduces the viability of development by increasing unnecessary costs. Furthermore, the duplication of building services and management systems is doubly concerning for Greystar as it is required to operate and maintain the systems in the long-term, unlike typical housing providers where the burden of maintenance in the long term falls to the owner.

In summary, we can confirm that whilst the support for PRS within the London Plan and the Draft Interim Housing SPG is welcomed, it is imperative that the preparation of these documents take account of the above observations and comments in order to incentivise this type of development.

We are available for further discussion with officers on these matters in order to ensure the final proposals provide the best balance for London.

Should you have any queries relating to the above, please do not hesitate to contact us.

Yours sincerely

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cc. Greystar LLP

## Mayor of London – Homes for Londoners Draft Housing & Viability Supplementary Planning Guidance 2016

### Consultation Response February 2017

#### 1. Introduction and Key Context

- 1.1 Greystar welcome the draft 'Supplementary Planning Guidance' (SPG) published on 29 November 2016. As the first document on housing policy since the election of Sadiq Khan as Mayor of London on 5 May 2016, it recognises historic problems surrounding the supply of new homes in London and sets out important policy proposals across all tenure groups by focusing on affordability.
- 1.2 Over recent decades in the UK, and in London particularly, the conventional model for housing delivery has resulted in increasing polarisation of affordability between 'for sale' and designated 'affordable' housing. Consequently, this area of policy has become understandably more contentious, whilst leaving a growing swathe of London's population finding themselves without practical or reliable accommodation choices – priced out of home ownership, and ineligible for designated 'affordable' housing – people who are nonetheless essential to the city's social and economic wellbeing.
- 1.3 The arguments in favour of including a stronger purpose-designed, purpose-managed rental sector within policy are well rehearsed, and it is not intended to repeat them in detail within this consultation response, other than the following key points:
  - a. The existing rental housing sector has frequently not worked well for its residents. The emphasis on the Build to Rent sector is therefore extremely welcome, and the acknowledgement of its distinct economics is helpful in encouraging investment and the delivery of additional homes for London.
  - b. Greystar's multifamily approach within the Build to Rent sector fits very well with the Mayor's outlined priorities. We have 30 years of experience of this type of managed community in the USA, where we are the largest operator. We seek to bring this model to London to provide purpose-designed rental communities, with purpose-designed accommodation and amenities, together with organised on-site management and secure tenancies for residents who wish to be long-term members of their neighbourhood. As a current example, our Greenford development in LB Ealing will be a really important purpose-built rental-led scheme in London – 1,965 new homes within a mixed-use neighbourhood that will be delivered significantly more quickly than if built conventionally for sale.
  - c. This type of development reflects a global investment asset class, which will harness new sources of funding to deliver genuinely additional homes beyond the historical providers of UK housing supply over recent decades.

- d. The multifamily rental model has the potential to deliver market and sub-market housing to a range of people who are not currently well served, across an attainable spectrum of affordability, in contrast to much of the existing polarised market.
- e. Greystar representatives have been actively involved in various discussions with GLA and other stakeholders regarding emerging policies in this area, and we hope that such discussions will be encouraged to continue as the sector develops.
- f. Greystar are actively involved with the British Property Federation (BPF) and Urban Land Institute (ULI), and have contributed to the compilation of their consultation responses to the draft SPG.
- g. In view of our primary activities being investment, development and asset management within the Build to Rent sector, we are limiting our responses here to Part 4 of the draft SPG, which is titled 'Build to Rent'.

## Specific commentary on Part 4: Build to Rent

Part 4 of the draft SPG document sets out the Mayor's support for the Build to Rent sector in specific terms, building on the broad support expressed fairly briefly in the previous Housing SPG dated March 2016. Set out below are a number of points on which we have observations or want to respond – all references relate to the draft SPG's paragraph numbers and text in italics are direct quotes.

**4.3 – Terminology.** The draft SPG acknowledges a variety of terms for purpose-built rental accommodation, including '*Multi-Family*', but concludes that all rental housing that meets the draft SPG's criteria should be referred to in planning terms as '*Build to Rent*'. It is welcome that a recognisable single term has been identified to describe this category of rental property.

**4.5 & 4.6 – Distinct economics of Build to Rent.** We welcome the clear guidance to Local Planning Authorities (LPAs) that they should consider the distinct economic factors when considering Build to Rent planning applications. We would be happy to collaborate with GLA and others in exploring ways in which this guidance can be communicated and best reinforced with the LPAs, as we are currently experiencing significant variety of understanding in discussions across different London boroughs.

**4.7 & 4.9 – Build to Rent 'Pathway' and Definition.** We accept the key principles described in the Build to Rent 'Pathway', which clearly differ from 'for sale' housing criteria, and the subsequent definition of Build to Rent.

**4.11 to 4.15 – Covenant & Clawback.** We acknowledge that during the covenant period, which the Mayor expects to be at least 15 years, Build to Rent homes must be retained in single ownership, i.e. individual units cannot be sold. It is important that the overall ownership of a Build to Rent development, or building(s) within a wider scheme, is permitted to change, and that clawback will not apply if the property remains in operation as Build to Rent. We note that any clawback mechanism that relies on a viability comparison of the Build to Rent scheme as a 'for sale' scheme is potentially flawed, due to the fundamental differences in the building design (including residents' amenity spaces, management areas, etc.) having an unrepresentative impact on valuation metrics.

**4.19 to 4.24 – Affordable Housing.** The expectations around affordable housing within Build to Rent developments, and how they differ from that applicable to ‘for-sale’ schemes, are broadly welcome and crucial to the SPG. Key points are as follows:

- We support the Mayor’s stated aim *‘to maintain the integrity of the Build to Rent development’* by permitting the affordable housing to be *‘entirely discounted market rent (DMR), managed by the Build to Rent provider and delivered without grant, i.e. entirely through planning gain.’* This is entirely appropriate for this tenure type – it allows operators to maintain ownership and management of all of the Build to Rent homes, which is better for all of the residents in an integrated community, and is cleaner in investment terms.
- We note that the Government’s recent Housing White Paper has introduced the term ‘Affordable Private Rent’ as an alternative term for discounted market rent. Whilst this additional terminology and acronym (APR) are not particularly welcome, it would be sensible and helpful if the London and national policies maintained alignment on which terminology to employ. For the purposes of this consultation response, we will continue to use the term DMR, as this is consistent with the draft SPG.
- DMR units can be genuinely *‘tenure blind’* by being *‘pepper-potted’* throughout Build to Rent developments. For example, whilst the unit mix we are proposing at our Greenford scheme will be agreed, the precise location of the DMR units within the building(s) will not be defined, and may change over time to reflect both actual demand experienced, as well as potential changes in the circumstances of the residents. This will help to create a long-term and sustainable community.
- As Build to Rent developments will frequently provide a new type of rental product into a given local area, the likelihood that rent levels in the new development will reflect a premium to existing rent levels in the immediate area should be appreciated. This is primarily because these new Build to Rent developments are typically not comparable to existing local stock, in terms of both superior accommodation quality and level of management. In order to address this issue, and to provide vital predictability to the investment model, levels of discount within DMR tiers should be related to the market rent levels within the new Build to Rent development or possibly, in time, similar developments in the local area.
- We have a number of observations on the stated preference for DMR rents to be set at *‘London Living Rent’* (LLR) levels. Whilst we recognise that this level of affordability is desirable politically, we note that its impact will inevitably vary widely across different parts of London. This is a complex area, and the effects on viability and investment are potentially significant, so it is important to clarify the following points:
  - The draft SPG recognises that the deeper discount implied by LLR, where required, will result in a lower quantum of affordable housing (para. 4.24). This will be determined by the viability assessment process, but expectations will need to be managed carefully with LPAs, and GLA could be even clearer about what these are likely to be.
  - Build to Rent developments are also likely to attract new residents from a wider catchment area than simply the immediate locality, so there is also an argument that relating rental levels to existing, narrowly-focused local income levels are not an appropriate benchmark, particularly for larger developments.



- It is noted that the GLA will update the local income data on an annual basis, but we recommend that there is also an annual and predictable mechanism for updating the LLR household income threshold value, which currently stands at £60,000 (<https://www.london.gov.uk/what-we-do/housing-and-land/renting/london-living-rent#acc-i-44674>).
- We welcome the mechanism by which the discount level to market rent may be set to reflect LLR for the initial tenancy '*with this discount then being applied to the current market rate for the development at the start of each new letting*'. It is important for investment modelling that DMR rents into the future are always related to market rent levels, rather than to local income levels over which providers have no control and which are impossible to model reliably into the long term. Please also see our comments on perpetuity below, as these issues are linked and will directly affect potential investment into the sector.
- It is also welcome that LLR is not the only allowable DMR rent level. Where agreed with the Local Authority, a wider range of DMR levels may be provided, to cater for '*specific local need*'. As an example at Greenford we are hoping to agree two different tiers of DMR with LB Ealing, which will provide a greater level of social mobility within the development should residents' circumstances change over time.

**4.25 – Affordable Housing in Perpetuity.** All affordable housing provided within Build to Rent developments, including DMR and LLR tenancies, is intended to remain affordable in perpetuity. Again, we understand the political importance of this but note that a significant likely problem for the future arises as currently proposed – it is probable that DMR rents will become constrained by the household income thresholds as defined for either LLR or intermediate DMR rent levels as time goes on.

In contrast to conventional affordable housing tenure types, which are typically transferred by the developer to a Registered Provider at the point of Practical Completion of the buildings, the ownership of DMR homes within Build to Rent developments will be retained by the Build to Rent investor for decades to come. As the value of the affordable housing provision is therefore never crystallised at a specific point in time, the future revenue from those DMR homes and associated viability therefore needs to be predictable to investors.

We suggest that this issue warrants further debate before the SPG is finalised, in order to ensure that future barriers to investment are not created inadvertently. We would seek an opportunity to participate in such discussions, as we believe there are a number of potential options to address the problem as and when it arises. We are currently working on how best to illustrate this issue alongside JLL, who are acting as our viability consultants on our Greenford proposals, and summarise this via the following points at this stage. Please note that, whilst Greenford is referred to here as an example for illustration, the principles of this commentary will apply generally across all Build to Rent developments.

- As it is defined as intermediate housing, DMR is subject to an income cap. In London, the Mayoral housing income threshold for intermediate tenures is £90,000 (see para. 3.44 of London Plan Annual Monitoring Report 12 – July 2016 update). At current rental levels at Greenford, this figure is some way above the level of household income required to afford the initial rent levels, and therefore the value of the DMR is determined only by the degree of discount applied (i.e. where the DMR is provided at a 20% discount, the value of the DMR = 80% of market rent).
- However, if rental inflation exceeds the rate at which the household income threshold is increased by the Mayor's office (assuming that it is raised to reflect income growth) it

will be this income cap, and not the originally agreed discount to market rent, that will determine the rent level at some point in the future. At this point, the value of the DMR would be constrained below the agreed discount level, which in turn would represent a significant problem of predictability for investors.

- We have modelled this issue in outline at this stage, in an attempt to demonstrate the potential timescales for this problem to manifest itself. Please note that the following examples assume that rental growth will exceed growth in the household income threshold by 2% pa, and are intended to illustrate the principles of this issue, rather than purporting to be exact predictions.
  - If a Build to Rent unit type currently has a market rent of £2,000 pcm, and a corresponding 80% DMR unit (i.e. 20% discount) has a rent of £1,600 pcm, then by Year 22 the income cap would limit the value of the rent, and the discount would start to exceed the originally agreed level of 20%.
  - Similarly, if a Build to Rent unit has a market rent of £2,200 and a corresponding 80% DMR unit has a rent of £1,760 pcm, then the income cap will adversely impact the degree of discount by Year 17.
  - These examples relate to larger units, as they naturally require a larger household income. However, what is clearly illustrated is that there is likely to be an adverse impact upon the value of DMR housing within approximately a 20-year period. Given that the stated intention is to deliver DMR housing 'in perpetuity', this has a clear implication for the investment value of such housing, and therefore for the overall Build to Rent scheme.
  - The sensitivity table below illustrates the forecast year during which the income cap, and not the discount initially agreed, is likely to determine the actual DMR rental level. Reasonably simply, it shows the implication for potential investors of an 'in perpetuity' requirement.

		Rental Growth				
		1%	2%	3%	4%	5%
Rental Values	£1,500			25 yrs	19 yrs	15 yrs
	£1,600		33 yrs	22 yrs	17 yrs	14 yrs
	£1,700		30 yrs	20 yrs	15 yrs	12 yrs
	£1,800		28 yrs	18 yrs	14 yrs	11 yrs
	£1,900		25 yrs	17 yrs	13 yrs	10 yrs
	£2,000		22 yrs	15 yrs	11 yrs	9 yrs
	£2,100		20 yrs	13 yrs	10 yrs	8 yrs
	£2,200		17 yrs	12 yrs	9 yrs	7 yrs
	£2,300	30 yrs	15 yrs	10 yrs	8 yrs	6 yrs
	£2,400	26 yrs	13 yrs	9 yrs	7 yrs	5 yrs
	£2,500	22 yrs	11 yrs	7 yrs	6 yrs	5 yrs

- Current and emerging policy envisages that the intermediate housing income threshold will be increased annually, to reflect income inflation. From an investor's perspective this mechanism is not guaranteed and, even if it were, it does not remove the problem outlined. There are therefore two risk areas for potential investors:
  - Firstly, income growth may well be lower than rental growth, meaning that the value of DMR in future will be forced below the initially agreed level, relative to market rent.



- Secondly, the household income threshold may not increase in line with actual salary inflation – this mechanism could be varied by successive Mayoral administrations, which may have different objectives from those currently envisaged.
- In summary, ‘in perpetuity’ DMR housing is likely over time to be subject to a form of rent control not linked to the performance of the rental market, but instead politically determined, and will therefore be deemed by investors to be unpredictable. We do not believe this to be the GLA’s intention, and we would welcome additional discussion on how best to address the issue so as not to put future supply at risk.
- **4.26 to 4.29 – Design.** Whilst there has been much recent debate about design flexibility in the Build to Rent sector, with reference to London Housing Design Guide criteria, much seems to focus on the size and design of apartments. Flexibility in the design of the overall building is generally more important for Greystar developments, particularly as we aim to secure efficiencies for the benefit of residents and our future long-term management operations. Key points that we welcome in the draft SPG include the following:
  - It is recognised that Build to Rent *‘can be particularly suited to higher density development within or on the edge of town centres or near transport nodes’*.
  - There should be flexibility applied to local policies regarding the mix of unit sizes in such locations *‘to reflect demand for new rental stock, which is much greater for 1 and 2 beds than in the owner-occupied or social rented sector’*. It is also noted that there may be *‘distinct viability challenges’* for Build to Rent if too many larger units are required within a scheme.
  - It is noted that Policy 3.5D of the London Plan *‘provides flexibility to consider innovative designs where they meet identified need and are of an exceptional design and standard’*.
  - It is noted that *‘space standards are not prescriptive regarding the layout of dwellings’*, which we interpret as perhaps also referring to the arrangement of units within the building rather than individual apartment layouts. Paragraph 4.29 encourages LPAs to *‘take into account the value of on-site management and purpose-built design’*. From specific issues that have arisen on our proposals to date, we trust that it is reasonable to assume that increased units per core, longer corridors, the relationship between private and shared external amenity space and single-aspect units will fall into this category of flexibility.
  - Finally, we note that the section concludes by stating that the length of the rental covenant *‘may influence the level of flexibility that is acceptable’*.
- **4.30 to 4.35 – Viability.** This section is clearly closely related to the earlier section on Affordable Housing, as well as paras. 4.11 to 4.15, and we will not repeat previous comments here. Importantly, it repeats the emphasis on *‘the distinct economics of the Build to Rent sector’*, and clearly states that viability assessments should be *‘specifically designed to deal with this model’*. Key comments are as follows:
  - Whilst the 35% threshold method for the a fast-track ‘Route B’ to affordable housing in ‘for-sale’ schemes has been widely publicised, the draft SPG makes clear that this *‘may not be appropriate for Build to Rent schemes’*. Roundtable meetings in advance of the draft SPG have suggested defining an alternative but analogous threshold method for Build to Rent development. As one of the

advantages of the threshold method is to avoid delay in delivery due to excessive time spent on viability assessment exercises, it seems a wasted opportunity to not apply such a method to the sector that is generally the keenest to deliver quickly.

- Whilst we appreciate that there is not yet a great deal of case-study evidence, we suggest that an alternative to the 35% threshold method figure for for-sale development would be extremely helpful in setting expectations for Build to Rent proposals – a figure around the 20% level has been suggested by all parties as likely to be sensible. With this in mind, it is hard to envisage the scenario described in para. 4.33 as being realistic. We would be happy to have further discussions on this point, either specifically to Greystar's experience or within the context of a sector roundtable group.
- It is noted that each scheme *'should be assessed on its own viability with the intention of maximising the supply of intermediate rent, preferably at London Living Rent levels'*. Such assessments for Build to Rent should follow the viability approach set out in Part 3 of the draft SPG, recognising that some elements of the traditional build for sale approach will need *'to be adjusted to take into account the distinct economics of Build to Rent'*. Over time, and we hope fairly soon, we would prefer the development of a generally accepted specific viability methodology for Build to Rent, rather than adapting a 'for-sale' approach which does not fit well for reasons set out previously.
- In the meantime, we welcome the recognition of key differences which include:
  - *'Build to Rent schemes being founded on long term rental revenue income from rents (taking account of management and maintenance costs) rather than short term sale receipts'*;
  - *A 'different approach to profit (often lower than a build for sale scheme)'*;
  - *'Different approaches to sales and marketing'*;
  - *'Rate of sale/disposal'* – recognised as generally faster for Build to Rent;
  - We note the phrase *'potentially lower risk [for Build to Rent] compared to for sale schemes'*, although this is an area which deserves further discussion.
- **4.36 & 4.37 – Management Standards.** We share the Mayor's ambition to provide a better rental experience for residents through support for Build to Rent as purpose designed and then purpose managed into the future. We welcome the approach that such improved experience needs to be demonstrated by showcasing *'best management practice'*. As specific comments:
  - *'Longer tenancies'* – we suggest that the wording of para. 4.9 *'(ideally three years or more)'* should be used again here. This approach will be incorporated within our wider lettings and management strategies, which will build on our existing systems in line with the SPG's aspirations. We also anticipate including additional features from our international experience, such as tenant loyalty programmes, to encourage the establishment of a long-term community;
  - *'Within these tenancies there should be formula-linked rent increases.'* We propose that rent increases within any tenancies longer than one year will be defined in advance through a pre-agreed mechanism, using formulae as appropriate, so that the resident is fully aware of this at the point of letting the property.
  - *'There must be on-site management.'* Greystar developments will generally be at a scale that ensures that there will be an on-site management presence at all

times. This is a core element of our management approach for ‘multifamily’ / Build to Rent development, which we know from experience will assist to establish the community and placemaking features as quickly and as permanently as possible.

- *‘Providers must have a complaints procedure in place and be a member of a recognised ombudsman scheme.’* Greystar will always have a complaints procedure in place, in accordance with our existing management systems, and we confirm that Greystar are an active member of the British Property Federation (BPF). Furthermore, Greystar are a founder member of the United Kingdom Apartment Association (UKAA), which was established in 2016 *“to professionalise and improve the service delivery of the residential rental sector in the UK by utilising and sharing best practices and knowledge gained from other agencies around the world”*. We suggest that the UKAA is added to the given list of recognised organisations.
  - *‘Finally, properties must be advertised on the GLA’s London-wide portal’* in addition to any other marketing. Greystar had a meeting with GLA in September 2016 to discuss proposals for the London-wide portal. We currently await further details of the GLA portal, but we are firm supporters of this initiative and confirm that it is our intention to advertise on this in due course. Further information on the likely timescales for availability of the portal would be very welcome.
- **4.38 & 4.39 – General Support for Build to Rent.** Part 4 of the draft SPG concludes with some additional points that further indicating support for the Build to Rent sector. We welcome all of these, as follows:
    - Local Authorities are encouraged to support Build to Rent *‘through spatial planning policies, Local Development Frameworks or local housing and other related strategies’*. This might include:
      - Encouragement of *‘long-term institutional investment’*, through working with GLA and delivery partners;
      - *‘Supporting institutional investment on public land’*, perhaps through joint venture arrangements or deferred land receipts. This is entirely sensible, but we anticipate the need for innovative procurement methodology to be developed in many cases to allow this to happen, and note that GLA intervention may be required in order to achieve this within reasonable timescales;
      - *‘Maximising the potential of Real Estate Investment Trusts and other vehicles to attract investment into the sector’*.
    - Finally, we welcome the stated intention that the Mayor will set out measures to support the Build to Rent sector in his new London Housing Strategy within the forthcoming London Plan. The likely timing of this is not specified, but we would like to remain engaged with the GLA in order to assist with this evolving strategy where possible.