

Mrs Tatiana Telles Ferreira comments

Page: [Draft New London Plan](#)

Section: [N/A](#)

0.0.11 This Plan must be read as a whole

Comment:

The fact that different chapters of the Plan complement each other makes more difficult to the reader to get the full information about each topic in one place i.e. Play Area, Tall Buildings, Build to rent Affordable. This makes the information to be repeated and sometimes incomplete in different topics of the plan.

Page: [Chapter 1 Planning London's Future \(Good Growth Policies\)](#)

Section: [N/A](#)

1.0.1 Good Growth

'Good Growth' approach proposes to achieve a socially and economically inclusive as environmentally sustainable environment, trough making all topics of the London Plan to work together, in parallel, instead of relying only in Design.

Page: [Policy GG3 Creating a healthy city](#)

Section: [N/A](#)

1.3.4 Healthy Streets Approach

Comment:

'Healthy Streets Approach' is expecting that streets account for 80% of London's public space to be driven by 10 Healthy street indicators, with a minimum of 20min of active travel per day

This would be done with proposals as the *"requirements for developers and councils to increase the proportion of cycle parking around new shops and homes, which could see cycling parking provision doubled in many new developments."*

Refer to : Policy T2 Healthy Streets / 10.2.7 The Healthy Streets Approach/ Figure 10.1 - The Ten Healthy Streets Indicators

Page: [Policy SD1 Opportunity Areas](#)

Section: [N/A](#)

Growth Corridors and Opportunity Areas

Comment:

The Growth relies in increasing density of small sites, well connected suburban locations, boosting development at transport hubs, intensify industrial adding mixed use development to it.

This density increase should be achieved by 'applying a design-led' approach and defining 'opportunity areas', mostly related to major infrastructure projects.

Important to note that the protection of Green Belts have been reinforced

Page: [Policy SD3 Growth locations in the Wider South East and beyond](#)

Section: [N/A](#)

2.3.3 Strategic Housing Market Assessment

Comment:

The question remains if this denser London will create sustainable communities over time.

Page: [Policy SD8 Town centres: development principles and Development Plan Documents](#)

Section: [N/A](#)

Policy SD8 Town centres: development principles and Development Plan Documents

Comment:

It is a very good approach considering a housing intensification through upper floors redevelopment of these big space areas, as it would increase the quality of the urban area, as it is already happening in some places in Croydon now, where big retail spaces are converted to residential developments.

Page: [Policy D1 London's form and characteristics](#)

Section: [N/A](#)

3.1.7, Deliveries shall be designed and managed in avoidance to residence nuisance /3.1.8 Storage space as per NDSS standards / 3.1.9 Design to Adaptable changes, Life Span, Maintenance / 3.1.10/ 3.1.12 Build in layers that can be replaced independently , Standardize components, Modular build, Reuse of materials, Uses Adaptability, Easy Disassemble

Comment:

The plan accesses in terms of construction and materials:

Designing for dismantling, re-use and recycling

Designing/ building in independent layers

Durability, adaptability and easy maintenance

Care of waste strategies and undisruptive deliveries (BOH strategy)

But is missing some important sustainability features as:

- **air quality standards as material toxicity (i.e WELL AIR 25 toxic material reduction)**
- **comfort: indoor pollutants (i.e HQM 09 Indoor pollutants)**

- preference to use of Natural “organic” building technologies/ Green products (i.e Hemp insulations, cork insulations, etc)

Page: [Policy D2 Delivering good design](#)

Section: [N/A](#)

Support - A. “To identify an area’s capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area-based strategies, which covers the following elements:

1. socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics)”

Comment:

Even if health and wellbeing indicators are mentioned in several Policies of the Plan, no mention is made to a proper guidance to achieve it as **WELL parameters** or similar

The Same applies to Sustainability residential standards. As CfSH was scrapped, we hoped that **Home Quality Mark** could replace it as a guidance to achieve a more Sustainable and Wellbeing Housing Standard.

We hope this will be mentioned later in the proposed SPG

3.2.4 Digital analysis using modelling techniques have to be undertaking during process / 3.2.8 Scrutiny shall include choice of materials, details and landscaping / 3.2.9 Landscape and facade design early stage and more general thorough details in approved drawings to avoid Planning Amendments and VEs

Comment:

The positive side of increasing details in early stages is that the quality of design can be maintained after planning approval. The negative side could be the risk that adding more layers to the system could cause delays obtaining planning permission. (TBD)

3.2.10 Same design team for all stages as a planning condition, to ensure quality design from beginning to end of the process

“It is generally beneficial to the design quality of a completed development if the architectural design team is involved in the development from start to finish. Consideration should be given to securing the design team’s ongoing involvements a condition of planning permission, or as a design reviewer where this is not possible.”

Maintaining design quality

“4. ..local planning authorities using architect retention clauses in legal agreements where appropriate”

Comment:

This policy aims to maintain good quality, through design continuity in the full development process, allowing local councils to use ‘architect-retention clauses in legal agreements where appropriate’.

This can be positive as avoid changing of architects after planning consent in favour of a “delivery” architects.

There is a question how this measure would apply to Design and Build where architects are not novated.

3.3.5 Refuges, evacuation lifts enclosures with fire resistance/ emergency evacuation

“...the installations of lifts which can be used for evacuation purposes (accompanied by a management plan) provide a dignified and more independent solution. Elements of construction forming refuges, evacuation lift enclosures and lobbies should incorporate suitable levels of fire resistance.”

Comment:

More stringent requirements in relation to Fire escape including disabled and older people access features is a common ground in the whole plan

3.3.7 Inclusive Design statement

Comment:

The Inclusive design statement is mandatory be included in the DAS

>

Private internal space

Topics 1-8

Comment:

Private internal space incorporate NDSS (Technical housing standards – nationally described space standard) requirements in terms of bedroom area, min dimensions, floor to ceiling heights and storage space requirements

But the plan forgot to mention some notes added to NDSS by 19 May 2016 as “1. Built-in storage areas are included within the overall GIAs and include an allowance of 0.5m² for fixed services or equipment such as a hot water cylinder, boiler or heat exchanger.”

E Dual Aspect x Single Aspect

“Residential development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Policy D1 London’s form and characteristics than a dual aspect dwelling and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.”

Comments:

It is expected to maximise Dual Aspect dwelling, and when not possible, Single aspects dwelling shall demonstrate its compliance in terms of adequate passive ventilation, daylight and privacy, minimising overshadowing and maximising the usability of outside amenity space and avoid overheating. This request will add another layer of tests and documents to be provided by planning submissions for proposals with single aspects units.

3.4.2 “Efficient use of land” to improve densities

“The space standards are minimums which applicants are encouraged to exceed. However, due to the level of housing need and the requirement to make the best use of land, boroughs are encouraged to resist dwellings with floor areas significantly above NDSS”

Comment:

“Efficient use of land” can tailor the profile future developments, reducing submission of High end proposals submitted, due to the risk of being resisted by the planners.

3.4.7 Communal play space

*“**Communal play space** for children and young people should be provided in developments with an estimated occupancy of ten children or more in accordance with the requirement of Policy S4 Play and informal recreation.”*

Comment:

Informal play areas ‘safe and stimulating’ and its safety be ‘independently mobile’ are a main concern in this plan. Overlooking and safe access to these spaces shall be considered when developing design.

More comments is Policy S4 Play and informal recreation below

3.4.10 Building distance as variety of housing typologies

A variety of approaches to housing typologies and layout of buildings should be explored to make the best use of land and create high quality, comfortable and attractive homes. For example, increasing ceiling heights and having bay windows can optimise daylight and sunlight and allow buildings to be closer together than can otherwise be achieved

Comment:

Proposals that promote variety in building typologies and layouts to increase the good design quality will help to achieve planning approvals

Bay windows can be used to place buildings closer to each other if required

3.5.8 Expected requirements for AD Part M unit type mix

“M4(2) and M4(3) dwellings should be secured via planning condition to allow the Building Control body to check compliance of a development against the optional Building Regulations standards. Planning conditions should specify:

Number of dwellings per size typology (i.e. x no. of y bed units) which are required to meet M4(2)

Number of dwellings per size typology (i.e. x no. of y bed units) which are required to meet M4(3) wheelchair accessible standards

Number of dwellings per size typology (i.e. x no. of y bed units) which are required to meet M4(3) wheelchair adaptable standards”

Comment:

It is a good initiative that the planner specifies clearly their expectations in relation to Part M4 units mix

This should be done in early stages, as these regulations have been causing confusion between designers as planning advisors due to the fact that AD Part M4 calls M4 (2) Adaptable as M4(3) Adaptable as well, and most of the times, in the case of Part M4 (3) is not clear if Adaptable or Accessible Wheelchair units shall be delivered.

Page: [Policy D8 Tall buildings](#)

Section: [N/A](#)

3.8.2 Tall building definition:

“For the purpose of assessing applications referable to the Mayor, a tall building is a development that meets one or more of the following descriptions:

- *it falls within the Thames Policy Area and is more than 25m in height*
- *it falls anywhere else within the City of London and is more than 150m in height*
- *it is more than 30m in height elsewhere in London.”*

3.8.3 Strategic Overviews Impact

“The Mayor will work with boroughs to provide a strategic overview of tall building locations across London and will seek to utilise 3D virtual reality digital modelling to help identify these areas, assess tall building proposals and aid public consultation and engagement. 3D virtual reality modelling can also help assess cumulative impacts of developments, particularly those permitted but not yet completed.”

Tall building locations

B. Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in Development Plans the locations where tall buildings will be an appropriate form of development in principle, and should indicate the general building heights that would be appropriate, taking account of:

the visual, functional, environmental and cumulative impacts of tall buildings (set out in part C below)

their potential contribution to new homes, economic growth and regeneration

the public transport connectivity of different locations.

3.8.1 The processes set out in Policy D2 Delivering good design will enable boroughs to identify areas where tall buildings can play a positive role in shaping the character of an area.

Comment: .

This topic reflect Mayor policy/concern about Tall Buildings and its Landscape impact in London, but at the same time the plan is missing a London-wide tall building policy instead of leaving to individual boroughs the choice or the important view impact and proposed locations for this buildings.

Page: [Policy D9 Basement development](#)

Section: [N/A](#)

“3.9.2 Most proposals for the construction of a basement will require planning permission. These proposals need to be managed sensitively through the planning application process to ensure that their potential impact on the local environment and residential amenity is acceptable. Where basement developments cause particular harm, boroughs can consider introducing Article 4 Directions to require smaller-scale proposals to obtain planning permission.

3.9.3 The Mayor considers that smaller-scale basement excavations, where they are appropriately designed and constructed, can contribute to the efficient use of land. They can provide an affordable option for families to provide extra living space without the costs of moving house, although these developments rarely result in the provision of additional residential units to help meet London’s housing need”

Comment:

The Plan even if not states a position against basement, it support the boroughs to use for Article 4 directions to prevent it if necessary.

Page: [Policy D11 Fire safety](#)

Section: [N/A](#)

Toughening up fire safety post-Grenfell

Comment:

Fire Statement will have to be submitted with all major development proposals.

The plan includes a series of strong fire safety measures minimise the risk of fire spread, suitable and convenient means of escape and robust strategy for evacuation

Page: [Policy H1 Increasing housing supply](#)

Section: [N/A](#)

4.1.8 Small sites helping in housing supply

Comment:

The new target of additional 65,000 homes a year, double of the current rate, expecting small and medium size housing developers to help to deliver housing supply through densifying small/medium sites for first time (approx.24,500 new homes a year), do not rely only in big developers as previously done in London.

As above, the main question about that is how much the local character of each Borough can be preserved in a so dense environment, and how much a neighbourhood sense can be kept.

As a parallel note, AAM could consider this Small/Medium size housing market as a potential market target to the office

Page: [Policy H1 Increasing housing supply](#)

Section: [4.1.8](#)

4.1.8 Small sites helping in housing supply

The new target of additional 65,000 homes a year, double of the current rate, expecting small and medium size housing developers to help to deliver housing supply through densifying small/medium sites for first time (approx.24,500 new homes a year), do not rely only in big developers as previously done in London.

As above, the main question about that is how much the local character of each Borough can be preserved in a so dense environment, and how much a neighbourhood sense can be kept.

As a parallel note, AAM could consider this Small/Medium size housing market as a potential market target to the office

Page: [Policy H2 Small sites](#)

Section: [N/A](#)

4.2.1 Small sites

“For London to meet its housing needs, small housing developments of between one and 25 homes must make a substantially greater contribution to new supply across the city. Therefore, increasing the rate of housing delivery from small housing sites is a strategic priority. Achieving this objective will require positive and proactive planning by boroughs both in terms of planning decisions and plan-making. “

4.2.5 Intensification of existing residential areas within PTALs 3-6 and within 800m of a Tube station

“Incremental intensification of existing residential areas within PTALs 3-6 and within 800m of a Tube station, rail station or town centre boundary is expected to play an important role in meeting the housing targets for small sites, particularly in outer London. This can take a number of forms including new build, infill development, conversions, demolition and redevelopment or extension of existing buildings, where this results in net additional housing provision. Within these areas, there is a need for the character of some neighbourhoods to evolve to accommodate additional housing. Therefore, the emphasis of decision-making should change from preserving what is there at the moment towards encouraging and facilitating the delivery of well-designed additional housing to meet London’s needs.”

Comments

Small sites (up to 0.25ha and capable of delivering 1-25 homes) are the hidden gem of increasing London’s density. Increased density projects for small sites should be granted permission in principle.

This will also play to infilling, the densification of existing schemes within PTALs 3-6 or within 800m of a Tube or rail station, or a town centre

I think should be studied case by case as this could affect the character and community sense of the some areas

Page: [Policy H6 Threshold approach to applications](#)

Section: [N/A](#)

Comment:

The Plan also includes a commitment for 50 per cent of all new homes built to be genuinely affordable. The plan also created a fast track route through the planning to projects that have a minimum of 35% affordable housing. This can save time and money on planning process, making the fast track attractive to private developers

4.6.3 How to measure affordable housing figures

“The percentage of affordable housing on a scheme should be measured in habitable rooms to ensure that a range of sizes of affordable homes can be delivered, including family-sized homes. Habitable rooms in affordable and market elements of the scheme should be of comparable size when averaged across the whole development. If this is not the case, it may be more appropriate to measure the provision of affordable housing using habitable floorspace. Applicants should present affordable housing figures as a percentage of total residential provision in habitable rooms, units and floorspace to enable comparison.”

Comment:

In future applications it is required to present the percentage of affordable housing figures in habitable rooms, units and floor space

Page: [Policy H7 Affordable housing tenure](#)

Section: [N/A](#)

A The Mayor is committed to delivering genuinely affordable housing. The following split of affordable products should be applied to development:

1) a minimum of 30 per cent low cost rented homes, allocated according to need and for Londoners on low incomes (Social Rent/ London Affordable Rent)

2) a minimum of 30 per cent intermediate products which meet the definition of affordable housing, including London Living Rent and London Shared ownership

3) 40 per cent to be determined by the relevant borough based on identified need, provided they are consistent with the definition of affordable housing.

These minimums will be reviewed in 2021, and if necessary, updated through Supplementary Planning Guidance.

B Only schemes delivering the threshold level of affordable housing with a tenure split that meets the requirements set out in part A can follow the Fast Track Route for viability”

Comment:

London living rent scheme is a new form of DMR (Discounted market rent).

This Intermediate Affordable figure tries to reach this layer of population, as young generation and independent professionals, to be able to save money in rent to save for a future deposit for your own property.

The questions are if all the discounted market rent must be set at the LLR and how it would work in PRS schemes.

Page: [Policy H12 Housing size mix](#)

Section: [N/A](#)

4.12.3 Family unit

“Family units have historically been considered to be those consisting of three or more bedrooms. However, as many families do live in two-bedroom units this should be taken into account when assessing the needs that different sized units can meet (in terms of bedrooms) and the design and approach to management of a development both for market and affordable housing.”

Comment:

Two bedroom units can be now considered family units, both for market and affordable housing, that is very important in calculating the expected unit mix of the proposed sites

4.12.6 Size of affordable homes

*“As part of their housing strategy functions, local authorities are required to have an understanding of housing needs in their area and this, along with their local Housing Register, will provide the evidence for the **size of affordable homes** (in terms of number of bedrooms) required to meet identified need. Combined with the considerations set out in part A of Policy H12 Housing size mix, this information should inform local policy or guidance about the size (in terms of number of bedrooms) of low-cost rented units expected on a development. This clarity about the unit size mix for affordable homes, taken together with the threshold approach to affordable housing, will help ensure applicants and landowners understand the cost implications of overall affordable housing requirements when formulating development proposals and purchasing land. Boroughs should take account of the availability of grant funding when producing guidance or policy on this issue.”*

Comment:

Having the Affordable housing requirement in feasibility stages can be very helpful it can speed viability negotiations and reduce time and cost to submit applications.

Definition of Build to rent

- A minimum of 50 units, all for rent
- A level of professional, on-site management and services provided
- Covenanted as rental for at least 15 years
- Unified ownership and management
- Three year assured short hold tenancy
- No letting fees

Affordability of Build to Rent

C“For Build to Rent schemes to follow the Fast Track Route they must deliver at least 35 per cent affordable housing, of which at least 30 per cent should be at London Living Rent Level, with the remainder being at a range of discounts below market rent to be agreed with the borough and/or the Mayor where relevant. Schemes must also meet all other requirements of part C of Policy H6 Threshold approach to applications. This threshold and affordable housing tenure split, will be reviewed and if necessary updated in 2021, through Supplementary Planning Guidance.”

D“Where the requirements of C above are not met, schemes must follow the Viability Tested Route set out in Policy H6. Viability assessments on such schemes should take account of the differences between Build to Rent and Build for Sale development and be undertaken in line with the Affordable Housing and Viability SPG”

Comment:

Build to rent have to follow the same Affordable policy as Built to Sale developments

PRS as such in not mentioned in this Draft Plan as it is in the current Plan

(Policy 3.8 Housing choice mentions PRS : “a1 the planning system provides positive and practical support to sustain the contribution of the Private Rented Sector (PRS) in addressing housing needs and increasing housing delivery”)

Should be the required 30% Living Rent (LLR) be applied to PRS Scheme and therefore be built for sale?

PRS is an increasing market in UK and the question is how to make this kind of development to be attracted to London in term of policy?

Should GLA allow the Affordable Private Rent to have special requirements of on affordable housing on Build to Rent schemes?

4.13.4 London Living Rent

*“The Mayor’s strong preference is for DMR homes to be let at **London Living Rent** level, to ensure city-wide consistency in approach. Unlike other DMR* products, London Living Rent has an advantage in that it has a London-wide electoral mandate, can be consistently understood and applied across London, can earn the public’s trust as being genuinely affordable, and will be backed by the GLA who will uprate it every year.”* *Glossary note: DMR: Discounted Market Rent

4.13.8 DMR Intermediate Housing

“In all cases the borough must ensure that the DMR units fully meet the definition of intermediate housing and are affordable to those eligible for intermediate rented housing in London, taking into account the Mayor’s guidance on this issue.”

Comment:

As commented above, London Living Rent is a new type of Intermediate affordable housing for middle-income Londoners. The intention is that LLR will be built using funding from our new Affordable Homes Programme and become available by the next five years. That is very good initiative

Page: [Policy S4 Play and informal recreation](#)

Section: [N/A](#)

5.4.5 Play Space On site

“Formal play provision should normally be made on-site and in accordance with Development Plans’ play policies for the area, using a benchmark of 10 square metres per child as a basis for assessing future requirements arising from a projected increase in the child population of the area. Supplementary Planning Guidance will provide additional detail on the application of this benchmark and other implementation issues. Where development is to be phased, there should be an early implementation of play space.”

5.4.6 Off-site provision

*“**Off-site provision**, including the creation of new facilities or improvements to existing provision, secured by an appropriate financial contribution, may be acceptable where it can be demonstrated that it addresses the needs of the development whilst continuing to meet the needs of existing residents. This is likely to be more appropriate for the provision of play facilities for older children, who can travel further to access it, but should still usually be within 400 metres of the development and be accessible via a safe route from children’s homes. Schools, school playing fields and other facilities can also provide an important contribution to play and informal recreation facilities and should be encouraged to allow community access to facilities out of hours.”*

Comments:

Play Space should be part of Chapter 3 Design standards as it was in the current Housing SPG?

The calculation parameter is very ambiguous (using a benchmark of 10 square metres per child) as it does not give parameters to define number of child per unit or bedroom.

Besides the calculation is missing to refer to **SPG play space calculation spreadsheet**, part of The Shaping Neighbourhoods: **Play and Informal Recreation SPG** , that is also under consultation

To help borough planning officers and developers estimate the potential child yield from a development, and the resulting requirements for play space provision, GLA we provides a play space calculator which can be downloaded using the link :

<https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/play-and-informal>

Page: [Policy E3 Affordable workspace](#)

Section: [N/A](#)

Policy E2 Low-cost business space

Policy E3 Affordable workspace

Policy E9 Retail, markets and hot food takeaways

6.9.9

*“Commercial activity provides opportunities for micro, small and medium-sized enterprises to establish and contribute to the diversity of town centres. Independent businesses, including shops, cafés and restaurants, play an important role in supporting the vitality and vibrancy of town centres and local communities, and many operate from smaller premises. In parts of London, **small shops and other A Class uses suitable for occupation by SMEs** may be in short supply and affordability can be a key concern. Larger developments that include a significant amount of commercial floorspace should support the diversity, vitality and vibrancy of town centres by providing a range of unit sizes that include smaller premises. Where there is local evidence of need, such developments should also include affordable units (secured through planning conditions or planning obligations as appropriate).”*

Comment:

Why Affordable Housing is more stringent in requirement and more micro managed than Commercial, Retail and Workspaces uses?

In this “Good Growth” approach, where all layers of the urban environment should work in paralleled, this Commercial topics are let to local decision and specific cases, instead of more thoroughly regulates

A percentage of this uses shall be kept for small and independent business to avoid the “branding” urban landscape and to keep the character of each area

This Residential affordable shall be give as preference for owners of local business helping to avoid commuting and fostering the micro economy of the place

Also more care about the urban uses mix shall be taken with a minimum distance between the same kind of use, avoiding for example “local supermarkets” every second corner

I think an Affordable Commercial policy shall be more designed to not lose urban quality and sense of community is proposed denser London.

Policy E2 Low-cost business space

Policy E3 Affordable workspace

Policy E9 Retail, markets and hot food takeaways

6.9.9

*“Commercial activity provides opportunities for micro, small and medium-sized enterprises to establish and contribute to the diversity of town centres. Independent businesses, including shops, cafés and restaurants, play an important role in supporting the vitality and vibrancy of town centres and local communities, and many operate from smaller premises. In parts of London, **small shops and other A Class uses suitable for occupation by SMEs** may be in short supply and affordability can be a key concern. Larger developments that include a significant amount of commercial floorspace should support the diversity, vitality and vibrancy of town centres by providing a range of unit sizes that include smaller premises. Where there is local evidence of need, such developments should also include affordable units (secured through planning conditions or planning obligations as appropriate).”*

Comment:

Why Affordable Housing is more stringent in requirement and more micro managed than Commercial, Retail and Workspaces uses?

In this “Good Growth” approach, where all layers of the urban environment should work in paralleled, this Commercial topics are let to local decision and specific cases, instead of more thoroughly regulates

A percentage of this uses shall be kept for small and independent business to avoid the “branding” urban landscape and to keep the character of each area

This Residential affordable shall be give as preference for owners of local business helping to avoid commuting and fostering the micro economy of the place

Also more care about the urban uses mix shall be taken with a minimum distance between the same kind of use, avoiding for example “local supermarkets” every second corner

I think an Affordable Commercial policy shall be more designed to not lose urban quality and sense of community is proposed denser London.

Page: [Policy G1 Green infrastructure](#)

Section: [N/A](#)

Comment:

The Plan intends to make London at least 50% green by 2050 and promote London as a National Park City, with greener infrastructure, and reducing car dependency. To do so it asks developments to increase bike parking in the projects and try car free schemes.

Maybe wider actions could be considered, as German’s initiative to zero cost public transport.

Improving public transport and the higher impact it has in each Londoner could be a good initiative not considered in this Plan. This could be made in partnership with Private sector in different forms as several examples around the world.