

From: Julian Carter <JuCarter@savills.com>
Sent: 12 December 2016 07:35
To: Your Views
Cc: John Lett; Julian Carter
Subject: A City for all Londoners: Consultation response

Dear Sir/Madam,

A City for all Londoners

Thank you for inviting comments on the Mayor's publication, A City for All Londoners, which we understand is the precursor of a next London Plan to be published for consultation in 2017.

As such, we wanted to take this opportunity to raise a number of matters on behalf of private clients which we think are likely to be key to the success of that document and which we trust you will be able to give consideration to during the preparation of your draft document.

We set these out, in no particular order, below:

1. Many policy documents have become long and inaccessible to many. We would encourage the Mayor to prepare a pithy document that is clear in its ambition, avoids repetition, and is therefore accessible to all. Many of the principles that guide good decision making are clearly set out in the NPPF but often seem to get lost within the weight of the written word as layer upon layer of detail is inserted into development plan documentation.

The plan should encourage Borough's to draft Local Plans similar in style to that prepared by London Borough of Ealing that simply identify areas where they deviate from or add specific detail to the London Plan.

2. Growth is good. Without growth, investment withers and the benefits associated with investment cannot be brought forward. Any planning policy document should be constructed in such a manner that it is absolutely clear that growth and investment is encouraged and will find support where it is brought forward

in a responsible manner.

Growth is dependant on talent and London must provide the infrastructure to support that talent including inspirational place and relevant and appropriate forms of accommodation. Policy should enable this and avoid an over reliance on prescriptive 'one size fits all' standards.

3. Any given pound can only be spent once. Development generates a finite pot of capital upon which there are many demands. It is unhelpful to have a plan with a wish list that is unrealistic about the demands on that capital and which sets up a policy framework that relies upon spending the same pound twice. To be helpful, any emerging development plan document should provide advice on how the competing demands on capital will be balanced. They should recognise the principles set out in the NPPF that identify the need for developers to make a competitive return and then set out a priority matrix of items for which subsidy will be sought depending on the nature and geography of any given development.

Turning to the document itself, we have the following comments.

The macro drivers

We agree that we need a better city for all Londoners. And we agree that London's population is fast growing and that this creates a pressure on land to meet this growth. We also agree that a series of macro economic and macro political decisions mean that it is increasingly difficult to predict the future.

London's entrepreneurs recognise this too. London's growth creates a market for investment which can be harnessed to build that better City but at the same time, those entrepreneurs need freedom to innovate and adapt to meet the needs that that desire to create a better City places on them. A good London Plan will define what that better City might be whilst setting out a policy framework that has an inbuilt flexibility to morph and respond to innovation and adaptation over time. A prescriptive London Plan that resists evolution and change will become a barrier to meeting the City's needs.

Intensification

We agree that we should intensify housing at transport nodes and in well connected town centres. We also agree that we need to create more and better opportunities for work. What the emerging plan does not clearly explain is what should happen to 'protected' employment land where it is also located at a transport node or in a well connected town centre. The plan should offer advice in this regard and should avoid contradiction. In our view, given the relatively small number of transport nodes and well connected town centres, the opportunity to deliver much needed homes should prevail, perhaps incorporating elements of employment use where appropriate. This ambition should be set into the context of persistent under

delivery of new homes in London against target, let alone actual need.

Mixed use to meet mixed needs

We agree that we should bring forward mixed use development. This, all the more, given the relative compatibility between the types of land use that can be found across our City, the development of homes above builders merchants being one example. But as part of this drive towards mixed use places, we should also recognise the increasing flexibility with which people use spaces. They work at home. They eat in the workplace. They live their lives in cafes and bars. They spend leisure time in shops. A new London plan should acknowledge and embrace this fluidity between uses and seek to provide spaces that are inherently flexible to allow them to respond to changing demand over time. Consideration should be given to whether the traditional 'use class order' remains the most appropriate tool with which to control the land use balance.

As part of this, consideration should be given to the lifestyle demands of different parts of the population from students, through graduates, to young couples, families, the retired and the old, to ensure that London as a City can deliver an environment suited to the needs of each and every group. Some may see the traditional home with its association with London parks and traditional town centres as an optimum condition. Others may see London as their living room and kitchen and this might generate a very different perspective on their demands from accommodation. Some of London's workforce might choose to rent. Others may have an ambition to buy. Some may live within the London Borough's. Others may commute in. All will place different demands on the City and emerging trends in the way people mix their working life with their social life may point to different strategies around the inclusion of 'lifestyle' uses within and around commercial buildings. Consideration should also be given to how development can create the opportunity for more vertical integration between learning and working.

Place

We agree that London's success is very much driven by its identity as a place and that the nature of that place is defined by the diversity of people who live and work in the City and their ability to contribute to and engage with that success. We agree that this can only happen well where a social and cultural infrastructure is embedded in place making strategy across the City and where Londoners are able to access that infrastructure and connect with one another. Policy should embed place making at its core.

Public Land

We support the release of surplus public sector land as a resource to facilitate growth. Where public sector land is occupied at urban densities below those that would be encouraged by contemporary density guidance (and particularly where it sits at a transport node or within a well connected town centre) we would encourage the Mayor to set out a positive planning framework promoting intensification whilst providing appropriate compensation to those who under occupy that land.

Pure 'protectionist' policies that seek to protect a generalised status quo in terms of land use or urban density should be avoided.

International trends

We are pleased to note the Mayor's ambition to ensure that London remains the top global business City. Investment by international business should be encouraged and progressive business models that can be shown to be internationally competitive should be embraced. We are also supportive of the Mayor's ambition to create a City that is economically active by night as well as by day, and that faces into various international time zones across the globe. And whilst people need places to live in and food to eat, it is the economic activity of the population that generates the wealth that can buy this food and shelter. Securing Economic success should therefore be the principle driver for the new London Plan.

Quality

We support the Mayor's drive to ensure that London is a City synonymous with a high quality of living and working environments, a high quality of architecture where the best of the old can be appreciated side by side with the best of the new, and a healthy environment that is kind to its citizens.

Green Belt

We think that the Mayor's stated intent to protect the green belt from development is inconsistent with some of the other policy ambitions set out in the consultation document. As with employment land, or under occupied land, where green belt land sits adjacent to a transport node or future transport infrastructure, the opportunity for that green belt land to contribute to London's needs should be considered, potentially considering land swaps or enhancement of green field land elsewhere to compensate. Similarly, poor quality green belt land should not be protected for green belt's sake, particularly where it fails to provide a meaningful green belt function or where release or even partial release could seed-fund the enhancement of otherwise low grade amenity land providing little meaningful benefit to anyone. As such, a new London Plan might explore a planning framework driven by the opportunity of locational geography rather than the perceived need to resolve a perhaps increasingly historic tension between land use typologies.

Typology

The Mayor's acknowledgement that tall buildings have a role to play in London is welcome. Tall building policy should recognise that development of scale can define its own context.

We would be grateful for your acknowledgment of receipt of these representations and would welcome an ongoing dialogue around the points raised. We look forward to engaging further.

Yours faithfully

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