

**Planning for a Better London  
London First Response  
05/11/08**

**1. INTRODUCTION**

1. London First welcomes the opportunity to respond to Planning for a Better London. We look forward to working with the Mayor, his advisers and officers, on the alteration and review of the London Plan.
2. London First is a business membership group whose aim is to improve and promote London to maintain and enhance its position as a leading world city. We do this by mobilising the experience, expertise and enthusiasm of the private sector to develop practical solutions to the challenges London faces and to lobby central and London government for the investment that London needs in its infrastructure. London First delivers its activities with the support of 300 of the capital's major businesses in key sectors such as finance, professional services, property, ICT, creative industries, hospitality and retail. Our members represent 26% of London's GDP.
3. We support the retention, as the Plan's fundamental objective, of the need to accommodate London's population and economic growth. This is not just critical for the capital but also for the well-being of the UK economy. The London Plan has been important in setting a vision for the capital and giving investors confidence over its future direction. It is vital that it continues to do this and to support the development needed to ensure growth is sustainable. The short to medium term economic context should not deflect from the need to accommodate London's long term growth.

**Context of change**

4. The alterations and review are being brought forward in an extremely poor and deteriorating economic environment; and the worst development market for decades. The first London Plan and previous alterations were drafted against the backdrop of strong economic growth and rising demand. London now faces slowing growth and recession, poor availability of commercial and personal finance and low demand for commercial and residential property. Although the fundamental supply/demand imbalance remains for housing, the market will struggle to respond in the short term. Policy, drafted for the duration of the plan must have inherent flexibility to be able to respond to these issues.
5. It is critical that policies are drafted and applied sensitively, and that planning obligations and requirements are not so great as to deter development. Development and regeneration remains vital to London economically, socially and to facilitate environmental improvement. In a strong and rising market, the Mayor, boroughs and their communities have grown used to substantial obligations and benefits from development. This is no longer possible, but development remains as critical to the capital. Planning authorities must therefore be realistic in what obligations can be sought from development and recognise the benefits development brings in itself.

6. The Mayor should, in his decisions and in dealing with boroughs, stress the importance of facilitating development and encourage flexibility and realism on the level of obligations development can sustain. Clear prioritisation is needed of the many obligations and requirements.

### **Planning to increase housing delivery**

7. Ensuring a realistic and sensitive planning framework is critical to delivering housing and consequently affordable housing (as much is delivered through section 106 agreements). This is especially important in the short to medium term when the economic environment will be extremely challenging. Policy needs to be clear and flexible and cognisant of the challenges affecting development.
8. Clarity will be needed on the objectives and priorities of different governmental organisations with a remit to deliver housing and a planning role: the GLA, LDA and HCA. As far as possible, developers should face unified objectives, policy and guidance. Planning policy should be addressed in the London Plan (part of the development plan) and supplementary planning guidance, and not in other documents such as the Housing Strategy or guidance prepared by HCA or LDA.

### **New approach to planning**

9. Strategic planning policy and decision making must balance local with pan London, and sometimes national, issues. We welcome the Mayor's commitment to an outcome based, rather than target driven, approach to planning and planning policy, and to focus on 'genuinely strategic issues'.
10. We agree that the Mayor should only use his planning powers in exceptional circumstances and that in most cases it is appropriate that boroughs determine applications. The Mayor's planning powers were amended to enable him to take over and determine applications as there are instances where strategic, sub-regional and London considerations need to be given additional weight against local issues. If London is to increase housing supply and meet its target, and deliver the commercial and other development needed to sustain its world city status and support a growing population, it will be necessary for the Mayor to take over and determine some applications.
11. We strongly welcome the Mayor's commitment, when commenting on applications, to focus on strategic issues, not matters of detail.
12. Mayoral planning policy should focus on areas where it can add value by addressing pan-London issues. Too much planning policy creates uncertainty and slows delivery. Mayoral policy should be strategic, not duplicating national guidance or addressing areas better dealt with locally. Supplementary planning guidance should only be prepared where it is necessary to provide further advice on policy implementation. It should not repeat the London Plan or seek to introduce new policy.
13. The GLA planning service is highly regarded. Investigating how this might be extended to provide wider support for planning in London could greatly improve planning in the capital, as would a London Planning Convention, bringing together the public and private sectors. London First would be pleased to work with the Mayor and his team to help deliver this.

14. Areas of planning are highly specialised but arise infrequently, where it would be beneficial for the GLA to provide expertise and assistance to the boroughs. One such issue concerns development proposals which are proximate to hazardous installations. Experts at City Hall, experienced in these matters, would aid the determination of these applications and liaising with the HSE.
15. We note the Mayor's proposal to review the sub regional boundaries. We agree that it is important that boundaries are permeable and cross-borough working is supported and encouraged. We support the need for the re-creation of a central sub region if this protects and enhances the importance of the CAZ, and a unified east London/Thames Gateway sub region if this leads to integrated regeneration.
16. Section 3 of this response highlights areas which we consider should be addressed in the review of the London Plan.
17. As important as policy itself, is the way in which it is implemented. Highlighted in section 4 are areas where the Mayor's objectives can be achieved through stronger enforcement of existing policy.

For further information contact:  
Judith Salomon  
Director of Planning and Development  
[jsalomon@londonfirst.co.uk](mailto:jsalomon@londonfirst.co.uk)

## **2. KEY POLICY RESPONSES**

### **ENSURING LONDON'S ECONOMIC SUCCESS**

18. London's economic success is critical to national economic well being and to securing social and environmental benefit for Londoners. We welcome the Mayor's commitment to ensuring continued economic success and providing a supportive policy and implementation framework. Light touch policy and minimal intervention is critical to encourage innovation and growth.
19. Planning requirements and obligations make development costly and complex; their cumulative impact threatens development viability. London First cannot support proposals which would increase the burden on development, for example requirements to provide small and affordable shops or other workspace.

#### **Tall Buildings**

20. Tall buildings of themselves are neither good nor bad. In a highly constrained city with high land values, it is necessary to maximise the use of brownfield land, especially in areas with good public transport accessibility, which in some cases will mean developing tall buildings. Well designed tall buildings create landmarks and can be important catalysts for regeneration, especially in opportunity areas. We welcome the Mayor's support for tall buildings in appropriate locations: adding to existing clusters and identifying areas for new clusters. We do not consider it necessary or appropriate to amend the strategic views.
21. Tall buildings need to be considered in economic terms as well as design. London First was part of the steering group for the recently published BPF research on the economic impact of tall buildings. Undertaken by Colin Buchanan, the report highlights the significant economic benefits derived from increased commercial density in areas of good public transport accessibility: by improving productivity and knowledge transfer.
22. Whilst it is appropriate that local context forms part of the consideration of proposals, it should be balanced against other issues including the benefits of development, and not given undue weight.

#### **Outer London Commission**

23. We welcome the establishment of the Outer London Commission to improve the economic success of outer London. As highlighted, 42% of current jobs and 60% of forecast growth is in outer London. The outer London economy is complementary to that of central London. Outer London will benefit from growth in central London, as residents spend locally supporting local business and through firms supplying those in central London. Outer and central London should not be treated as competitive; measures to enhance outer London should be taken in tandem with support for central London.

## **CAZ Framework**

24. This approach will be achieved in part through a supportive planning framework that promotes the success of central London. The CAZ framework is critical to help central London grow and address its challenges, particularly those facing the West End. The CAZ is the most important part of the country economically, for culture and tourism. CAZ policy must protect and enhance the area's unique role in accommodating London's world city functions, are defined in the London Plan as: finance, retail, tourism and culture.

## **The West End**

### **Retail**

25. We welcome the Mayor's commitment to improve the West End in partnership with Camden and Westminster. The West End suffers from congestion, a poor environment and poor public realm, as well as increasing competition from new centres in White City, Stratford (2010) and new development at Brent Cross, Elephant and Castle, Battersea and Croydon. The opening of Crossrail in 2017 provides the focus to address the challenges facing the West End. As well as addressing the long term competitiveness of the West End, measures should focus on improving the public realm ahead of the 2012 Olympic Games.
26. The scope for development in the West End is highly constrained by strategic views, listed buildings, and the inclusion of Oxford Street in twelve Conservation Areas. Policy should explore how to review the balance between the need to underpin the long term sustainability of the area through renewing the stock, and preserving heritage.
27. Large, modern flagship stores which contribute to the area's unique offer need to be accommodated, especially to anchor the east end of Oxford Street. Many existing retail units are too small. Planning policy should support larger and higher developments. Use of compulsory purchase powers may be necessary to assemble development sites. A pragmatic approach will also be needed to development within conservation areas and of listed buildings, enabling development and ensuring it is of excellent design quality.
28. Limited development capacity is further compromised by the requirement to include housing. Requiring already constrained sites to accommodate three land uses (commercial, housing and affordable housing) leads to poor development in terms of amenity, use and design. Greater pragmatism is required on the application of mixed use policy, acknowledging the primary commercial purpose of the CAZ.

## Offices

29. The West End office market is crucial to the national economy and an important location for international headquarters and financial services. It also provides an important customer base for retail.
30. West End rents are consistently amongst the highest in the world. The 2007 London Office Policy Review reported that availability fell from 6.4% to 5.4% during 2006 with headline rents increasing by 22% to £890 per m<sup>2</sup>, more than twice the rate of increase in 2005. Rents have shown a clear long-term upward trend in rents over the past 20 years. This is because of strong demand and highly constrained supply as a result of planning policy and heritage designations.
31. In a recent report commissioned by Westminster City Council<sup>1</sup>, Drivers Jonas conclude that Westminster's policy on mixed use and conservation is responsible for reducing office stock in one of the world's foremost office markets, which is driving up rents. The report recommends that the balance of uses and values in Westminster should be considered in the context of London as a whole.
32. The report highlights that office developers are restricted by conservation areas, listed buildings, high residential values, and the need to provide housing and affordable housing. It finds that:
  - Prime West End rents are the highest in the world by some margin.
  - Rents in sub-markets have reached record levels in all sub markets.
  - Prime Mayfair rents are double their 1980 values in real terms.
  - Prices are not driven by demand which is running at average levels.
  - Planning policy has been driving the delivery of housing.
  - The West End has consistently produced less new office space than the City.
  - The West End is the only European central business district where the office stock has fallen.
  - Analysis of planning permissions highlights further potential for a net loss of office stock in all sub markets, bar Paddington.
  - Policy to promote housing has therefore been successful but at the expense of office availability and high rents.
33. It is critical that policy encourages and supports office development; ensuring stock is regenerated, and offering occupiers the best quality space. Policy should ensure that there is no further loss of office stock in this strategic office location of national importance.
34. As noted in the Mayor's response to Westminster's Core Strategy preferred options, policy should "seek to sustain and enhance the Central Activities Zone as the country's most important strategic office location to ensure there is adequate capacity to meet future demand with supporting policies to enhance the zone as a globally attractive business location."
35. Planning gain priorities and expenditure are fragmented and should firmly and clearly prioritise transport and the public realm improvements to the West End.

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<sup>1</sup> The importance of the historic environment to the office market in Westminster, December 2007, Drivers Jonas

## **Town Centres/Retail**

36. The forthcoming Experian update of the London Retail Assessment will be important in aiding the review of the town centre hierarchy and ensuring that development is supported and directed appropriately.
37. We support the Mayor's desire to promote a diverse and dynamic retail centre. This should be achieved on an area basis (based on functional catchment areas) and not through requirements on individual developments as part of section 106 agreements.
38. The planning system cannot require one business to subsidise another. Requiring developers to provide affordable small shops through section 106:
  - Creates additional cost and complexity;
  - Does not meet the tests of the Circular (what impact would the provision of small shops mitigate?);
  - Would breach EU regulations on state aid by requiring cross- subsidy between businesses and through favouring occupiers of new stock over those in existing premises;
  - Creates uncertainty and complexity as to how small and affordable will be defined and reviewed; and
  - If implemented, is likely to result in empty units as the leasing transaction costs and tenant risk would outweigh rental income. This would lead to poor public realm and increased risk of crime.
39. The Mayor should investigate other ways to encourage a dynamic and diverse retail sector, for example through the work of Business Improvement Districts and improving high street amenity and public realm.
40. The forthcoming Business Rates Supplement Bill affords the opportunity to redress the exclusion of property owners from BID legislation: something London First and the property industry have always supported. The Government resisted the inclusion of property owners in the legislation, despite lobbying from the property industry to be included. The Mayor could consider this approach being piloted in London, which would be supported by occupiers and owners and would help meet the objective to improve town centres and retail diversity.

## **DELIVERING HOMES FOR LONDONERS**

41. London First looks forward to consultation on the draft Mayor's Housing Strategy. Clear distinction is needed between policy contained within the Housing Strategy and the London Plan. Planning policy, to be reflected in borough local development documents and taken into account when determining applications, must be within the London Plan which is part of the development plan, and not the housing strategy.
42. London faces a continued challenge in meeting demand for new homes and addressing historic undersupply. In the next few years this will be made more difficult by the poor state of the housing market.
43. We agree that increasing development density throughout London will be important to achieving increased housing supply and that this should be done in tandem with initiatives to improve the quality of housing including designing safer, liveable neighbourhoods. We caution against the need for further policy or

guidance on housing design: there is already a plethora. The Mayor's concerns could be met through stronger enforcement of existing policy.

44. There has been confusion over whether the Mayor intends to introduce space standards for market housing. Seeking larger units reduces their affordability: affordability and the size of units directly correlate. More floorspace costs more. The increased cost to the developer of providing larger units (through reducing the density) would need to be off set against other planning obligations and requirements.
45. We strongly welcome the removal of the 50% strategic affordable housing target which proved unachievable and counter-productive to efforts to increase housing supply. We await detail on how borough numeric targets will be reflected in local development documents and applied to development proposals. Developers and landowners will need clarity on the level of affordable housing being sought when preparing proposals and negotiating other requirements and obligations. Greater uncertainty could frustrate some development and is likely to increase reliance on viability testing of individual schemes.
46. We also strongly endorse changing the ratio of social and intermediate housing. London First has always advocated that, given the existing provision of social housing, the emphasis (70%) of new supply should be on intermediate provision. London already has a substantial stock of social housing (a quarter of the housing stock), which could be used more efficiently, including ensuring that there is sufficient intermediate accommodation for those that do not need to be in social housing but can't access market housing.
47. Intermediate housing is particularly important for private sector employees, not categorised as 'key workers' but who are essential to London's economic well being.
48. Household growth will be between 560,000 and 700,000 new households by 2026; 75% in single person households, the remainder being lone parents and other multi-adult, non family households. The make-up of new housing supply will need to reflect this: larger units should only be sought where there is evidence that they are needed and in tandem with measures to make better use of the existing stock.
49. The need for family sized affordable homes can in part be addressed through making better use of existing housing. Evidence prepared for the Draft Mayor's Housing Strategy (2007) founds that, 7% of households in the social sector in London are under occupying their homes by two or more bedrooms (around 58,000 households). Less than one in eight of these are on the transfer list.
50. Through his housing powers the Mayor could encourage innovative schemes which incentivise people to leave social housing which they are under-occupying. This could also include schemes where those leaving larger units are given priority in new social housing.
51. Increasing supply of bespoke accommodation for the elderly and students would also release larger family homes.

## ALLOWING LONDONERS TO ENJOY THEIR CITY SAFELY

52. We share the Mayor's objective to ensure that London's communities; business and residential, benefit from a safe and well designed environment. We have highlighted (in section 4) where stronger application of existing London Plan policy could achieve this. We query the necessity of further guidance on designing out crime and anti-social behaviour.

## MEETING THE ENVIRONMENTAL CHALLENGE

53. We support the Mayor's objectives to address climate change: adopting mitigation and adaptation measures. The planning system has an important role to play but must be complemented by other measures, including, most critically, encouraging behaviour change. Policy should be outcome not target based.

### Energy

54. Whilst micro-generation has a role in contributing to energy supply and providing renewable energy, securing renewable energy and achieving the objective of decentralising a quarter of London's energy requires a strategic approach based on district-wide solutions to address the existing stock as well as new development. The Mayor and LDA will be critical to delivering this, working with boroughs, energy providers and developers. The London Plan should promote district wide decentralised energy provision, rather than seeking each development to provide decentralised energy, and require development to connect to and contribute to the cost of district supply through s106.
55. London First commissioned Buro Happold to undertake research into how 25% of London's energy supply by 2025 can be decentralised: identifying barriers and how they may be overcome. The project was overseen by an expert steering group, chaired by Neil Pennell, Project Engineering Director of Land Securities. As well as seven case studies, over 30 in depth interviews, seven topic based workshops and a seminar were attended by experts from over 90 different organisations from the public and private sector. The report can be found at [www.londonfirst.co.uk](http://www.londonfirst.co.uk).
56. The report's five main recommendations to deliver decentralised energy are to:
- Introduce economic incentives for CHP such as an obligation or minimum floor price for low carbon electricity;
  - Establish infrastructure at a district level;
  - Establish Energy for London to ensure implementation across London;
  - Develop energy masterplans for each borough; and
  - Introduce public private partnerships to deliver projects.
57. Key to this is the LDA/GLA working with boroughs to undertake heat mapping and masterplanning for new energy infrastructure to serve the existing stock as well as new development. Where developments are too small to viably provide decentralised energy on site they would contribute to a Green Energy Fund for the cost of new energy infrastructure through section 106 or the Community Infrastructure Levy, and would commit to connect to the new infrastructure.
58. Energy from waste will be an important component of renewable energy supply. Planning for waste and energy should be co-ordinated to maximise opportunities from both.

## **Waste**

59. A similar strategic partnership approach with business should be adopted for London's waste policy. The Mayor chairing the London Waste and Recycling Board gives the opportunity to adopt a more strategic and realistic approach to meeting London's waste challenge. Current policy is predicated on many small waste facilities located across London. Seeking a large number of smaller facilities makes delivery difficult by increasing the planning risk and eliminating benefits achieved through economies of scale. Given the urgency with which new facilities are required we cannot afford planning delay. The inefficient nature of a large number of small contracts would lead to increased costs which are likely to be fed back to the council tax payer.
60. The optimum approach to the development of new waste facilities would be a mix of large and medium sized facilities across London which would comprise facilities for domestic and commercial waste. They would also comprise a mix of technologies supporting energy from waste and recycling, composting, mechanical biological treatment (MBT), biodigestion, together with remanufacture facilities. They would also have storage and transshipment capability for recovered material to be exported elsewhere in the UK.
61. These are likely to require about five hectares each resulting in a total land take of 150 hectares. This represents about half the estimate in the London Plan which would therefore lead to significant blight, reducing land available for other uses such as housing.

## **KEEPING LONDON MOVING**

62. London First supports the use of section 106 obligations to contribute towards the funding of Crossrail. Contributions must be equitable and reasonable and be considered in the context of other planning obligations and requirements particularly bearing in mind the economic circumstances which are likely to prevail for the short to medium term. This will be critical to ensure development is undertaken and not frustrated.
63. We support the Mayor's objective to ensure decisions on transport infrastructure and funding and development are taken in a coordinated way. As part of this, development opportunities at and around transport nodes should be exploited, including maximising the value of TfL's own property portfolio.
64. Business wishes to be involved in the review of a proposed airport in the Thames Estuary. We note that this falls outside London and the jurisdiction of the London Plan. Any such review does not preclude the need for short term investment and regulatory change at Heathrow. Moreover, the Mayor's opposition to a third runway at Heathrow should not obviate support for such change.

## **PLANNING FOR LONDON'S DIVERSE PLACES**

65. London First welcomes the link made by TfL between transport capacity and housing growth, in particular the effect that Crossrail will have. Accessibility is a strong market driver. The Thames Gateway as a whole is not well served by public transport; any review of targets and spatial allocation for housing growth must be focussed on existing and planned transport hubs.
66. To facilitate regeneration east London urgently needs the Thames Gateway Bridge to increase accessibility to the rest of London.
67. London First supports the desire to deliver a strong legacy from the Olympic Games capitalising on the opportunity to create a new London quarter and accelerates regeneration of the Lower Lea Valley. A holistic approach encompassing should ensure that the park links in existing communities, both in terms of land use, and through physical infrastructure connections to the rest of east and central London.

## **IMPLEMENTATION**

68. To ensure delivery of housing and other development, especially in a poor economic environment, planning obligations and requirements must be sensitive to development viability.
69. The sentiment in Policy 3A.10 (negotiating affordable housing in individual private residential and mixed use schemes) on the need to encourage rather than restrict development, should be reflected in Policy 6A.5 Planning obligations. The Policy could be amended to include:  
  
“boroughs should seek maximum reasonable planning obligations, having regard to the need to encourage rather than restrain development. Boroughs should consider the cumulative impact of planning obligations and requirements on development viability.”

### 3. ISSUES FOR REVIEW

70. The review of the London Plan must retain as core objectives:
- the need to maintain and enhance London's world city status;
  - support for commercial development and protection and enhancement of the CAZ;
  - delivering housing and the other development needed to accommodate London's population growth;
  - the importance of integrating transport and development and the need to make the best use of brownfield land in order to protect open space and the green belt;
  - promoting sustainable development, tackling climate change and protecting the environment; and
  - ensuring all of London and all Londoners benefit from economic growth.
71. The following areas should be addressed in the review:

#### **Review of Employment Land**

72. In line with Government guidance (draft PPS4) the Mayor should undertake a combined assessment of housing capacity and employment land. Mixed use and residential development is still frustrated by historic employment land designations which are no longer needed or where employment land can be consolidated. The London Plan should also include a policy encouraging boroughs to undertake regular reviews of employment land.
73. Recommendation H3 of the Inspector's report on the early Alteration of the London Plan (2006) recommended that boroughs undertake comprehensive employment land reviews to identify opportunities for housing and mixed use development. Boroughs should review their practices on safeguarding land allocated for employment use to ensure that it is not held for inappropriately long periods without justification.
74. Greater realism is required as to what is an appropriate period to market an employment site before it can be considered that a market does not exist. This is an area where pan London policy would be helpful; the Mayor should give consideration to providing guidance to boroughs on the appropriate marketing period for employment land. This currently varies from one year to as many as five. Policies requiring an excessive marketing period sterilise land and prevent regeneration.

#### **Developments near hazardous installations**

75. The London Plan should provide policy on the consideration of applications proximate to hazardous installations that balances risks with the other objectives of the Mayor and London Plan.
76. Advice from the HSE on developments proximate to hazardous installations threatens housing supply and other development in London. Mixed use and residential sites are affected across London including strategic regeneration areas of the Lower Lea Valley, Battersea and Greenwich Peninsula.
77. Boroughs do not have sufficient expertise to interpret and apply advice from PADHI (the automated system designed to assist planning authorities) and understandably consequently adopt a cautious approach. The issue is

exacerbated by poor HSE resource which prevents the HSE from engaging with boroughs and applicants in pre-application discussions.

78. PADHI takes an 'incredible' approach to the risk, looking at a 'worst case' rather than 'worst credible' scenario. This has led to an unduly conservative approach to risk. PADHI is a useful tool but needs to be supplemented with individual site assessments, taking account of mitigation, to enable balanced judgement.

### **Coach facilities**

79. The review of the Mayor's Transport Strategy and London Plan affords the opportunity to investigate coach provision in London; whether there should be a single or multi hub solution; whether Victoria, as an Opportunity Area designated to accommodate substantial commercial and residential development, is an appropriate location for a coach station; and options for alternative provision.

### **Safeguarded wharves**

80. The use of the River Thames for transporting goods, in particular waste and aggregates, is an essential part of sustainable transport in London. Retained wharf capacity is needed to protect the viability of the river for freight transport. But wharf safeguarding, as with other land use designations, must balance the need to protect working wharves with other policy objectives such as increasing housing supply and promoting regeneration.
81. The London Plan review should reassess the extent of wharf safeguarding and the amount of land needed to be safeguarded based on a realistic updated assessment of the level of capacity required.
82. The 2003 review of safeguarding was based on over-estimated levels of demand. Viability assessments of individual wharves failed to fully assess access from the wharves to the road/rail network and the navigation requirements of larger ships which are now used, and failed to take into account technological changes which mean less operational land is required. Even where a wharf is safeguarded, some land could be released for development, subject to planning conditions which would ensure that the adjacent development would not undermine the wharf's ability to operate.
83. The current approach to wharf safeguarding is blunt. The award of safeguarded status, in itself, can do little to promote or maintain freight use. Nor does it provide a flexible framework for assessing the potential future viability of individual wharves when they fall out of use. Full safeguarded status should be given only to wharves that have fallen out of use and that are under imminent threat of permanent redevelopment for non-freight uses, and following the positive outcome of a thorough viability assessment.

## **Recognising the importance of London's Higher Education Sector**

84. The London Plan should seek to strengthen London's role as a centre for excellence for higher education, and the importance of teaching and research. Universities and higher education colleges in London employ over 55,000 staff and teach 394,000 students from over 200 different countries; the most diverse student body in the world. London attracts 90,000 students from outside the UK each year (about 70% from outside the European Union). London's higher education institutions generate £11 billion each year in goods and services within the UK and £1 billion in export earnings.
85. London is also home to some of the most internationally renowned research-intensive institutions. Universities and higher education colleges in London competitively win £700 million in research funding each year, £90 million of which is from overseas.
86. Higher education faces increased global competition. The London Plan should develop a vision for this important sector with universities and business and ensure it is supported, promoted and enhanced through planning policy.
87. Critical to supporting the higher education sector is ensuring that there is sufficient provision of bespoke student accommodation. Not only is this a vital part of the education offer, it frees up larger market housing otherwise used by students. Planning policy should give greater support for the provision of student housing, which might form part of intermediate supply on larger schemes, and should be clear that student housing is not expected to provide affordable housing.

#### 4. EXISTING POLICY WHICH MEETS THE MAYOR'S OBJECTIVES

88. This section highlights where application of existing London Plan policy would achieve the Mayor's objectives:

##### **Heritage protection and guarding against inappropriate tall buildings**

###### **Policy 4B.9 Tall buildings – location**

"...Boroughs may wish to identify defined areas of specific character that could be sensitive to tall buildings within their DPD [Development Plan Documents]."

###### **Policy 4B.10 Large-scale buildings – design and impact**

"All large-scale buildings should be of the highest quality design and in particular:

- Meet the requirements of the View Management Framework...
- Be suited to their wider context in terms of proportion and composition and in terms of their relationship to other buildings, streets, public and private open spaces, the waterways and other townscape elements...
- Be attractive city elements as viewed from all angles....
- Illustrate exemplary standards of sustainable construction and resource management...
- Pay particular attention, in residential environments, to privacy, amenity and over-shadowing..."

###### **Policy 4B.11 London's built heritage**

"The Mayor will work with strategic partners to protect and enhance London's historic environment."

###### **Policy 4B.12 Heritage conservation**

"Boroughs should:

- ...identify areas, spaces, historic parks and gardens, and buildings of special quality or character, and adopt policies for their protection and the identification of opportunities for their enhancement, taking into account the strategic London context..."

###### **Policy 4B.14 World Heritage Sites**

"The Mayor will work with the relevant boroughs, English Heritage and site owners and occupiers to agree and to implement management plans for London's world heritage sites. DPDs and management plans should contain policies that protect their historic significance and safeguard, and where appropriate, enhance their settings. In considering planning applications the Mayor will, and boroughs should, take account of, and give appropriate weight to, the provisions of the World Heritage Site Management Plans."

89. Additional protection is proposed in the Government's review of call-in directions which will require "authorities to refer cases where English Heritage has objected on the grounds that a proposed development could have an adverse impact on the outstanding universal value and significance of a World Heritage Site or its setting." [Review of call in directions, CLG, January 2008.]

#### **Policy 4B.17 View Management Plans**

This policy establishes the purpose of the plans and how they are to be implemented, for example by:

- preventing “undue damage to the view either by blocking, or unacceptably imposing on a landmark or creating an intrusive element in the view’s foreground or middle ground.”
- “...protect backgrounds that give a context to the landmarks.”

#### **Policy 4B.18 Assessing development impact on designated views**

“The Mayor will and boroughs should normally refuse or direct refusal of all developments within the landmark viewing corridors above threshold heights, and development within the landmark background and lateral assessment areas, which fails to preserve or enhance the ability to recognise and appreciate landmark buildings. The Mayor will and boroughs should normally refuse or direct refusal of developments in front of middle ground assessment areas that are overly obtrusive, unsightly or prominent to the detriment of the view as a whole.”

### **Support of small shops and town centres**

#### **Policy 3B.1 Developing London’s economy**

This policy states that the Mayor will seek “a range of workspaces of different types, sizes and costs to meet the needs of the different sectors of the economy.”

#### **Policy 3D.3**

This policy seeks a policy framework for “maintaining, managing and enhancing local and neighbourhood shopping facilities and, where appropriate, for the provision of additional facilities in accessible locations, including to serve new residential communities.”

### **Town centre regeneration**

#### **Policy 2A.2 The spatial strategy for development**

Promotes: “enhancing and diversifying the role of town centres”

#### **Policy 2A.8 Town centres**

Promotes: “sustaining and enhancing the vitality and viability of town centres” and “...accommodating economic and housing growth through intensification and selective expansion...”

#### **Policy 3D.1 Supporting town centres**

“The Mayor will and boroughs should enhance access to goods and services and strengthen the wider role of town centres...Encourage retail, leisure and other related uses in town centres and discourage them outside the town centres...Improve the competitiveness and quality of retail and other consumer services in town centres...Support a wide role for town centres...Support and encourage town centre management...”

#### **Policy 3D.2 Town centre development**

This policy sets out how borough policies should support town centres and resist out of centre development or intensification.

## **Safety, security and designing out crime**

### **2A.1 Sustainability criteria**

The following criteria should be applied in development plan documents and to applications: “Taking account of the objectives of promoting safety and security...”

### **3A.6 Quality of new housing provision**

“Design of residential developments should take into account safety and security.”

### **3C.10 Public transport security**

‘The Mayor will work with TfL, government, transport operators, the police and other strategic partners to co-ordinate the implementation of security measures to ensure that London’s transport network and services are as secure as is reasonably practicable and are as safe as possible in the operation of services and facilities.’

### **4B.1 Design principles for a compact city**

Developments should: “address security issues and provide safe, secure and sustainable environments.”

### **4B.6 Safety, security and fire prevention and protection**

“The Mayor will and boroughs should seek to create safe, secure and appropriate accessible environments where crime and disorder, including terrorism, and fear of crime do not undermine the quality of life or community cohesion....Proposals should also address the fear of crime as well as minimising potential crime itself through good design.”

## **Green Belt development**

### **Policy 3D.9 Green Belt**

“The Mayor will and boroughs should maintain the protection of London’s Green Belt....There is a general presumption against inappropriate development on the Green Belt, and such development should not be approved except in very special circumstances.”