

**AECOM RESPONSE TO THE
DRAFT LONDON PLAN 2018**

AECOM
Aldgate Tower
2 Leman Street
E1 8FA
London, UK

Dear Mayor Khan,

AECOM welcome the opportunity to respond to the London Plan and consider it to present an ambitious and exciting vision for London, which can deliver real change in the capital and the city region.

Enclosed is our response. Rather than commenting in detail on individual policies, we have set out ten key areas that should be enhanced. We have also identified some ideas that are not considered in the plan that we think will be important to the future that the London Plan should not be silent on these topics.

We consider that new ways of delivery will be fundamentally important to the implementation of the London Plan. The right delivery models will ensure that London - and particularly the GLA - has the right resources and calibre of skilled people to deliver ambitions for homes, jobs, regeneration and infrastructure.

AECOM is a major London employer with over 5,000 people across our offices in and around the capital and our teams of built environment specialists are passionate about improving the city. Our team of urban planners, architects, consultants and engineers draw upon a global best practice network of nearly 100,000 people who are active in urban development and regeneration across the world. We are increasingly involved in the funding, construction, and operation of buildings and infrastructure. We are well placed to assist the GLA and other stakeholders in realising the ambitions of the London plan.

We hope you find our suggestions helpful, and we look forward to helping London realise the plan.

Yours Sincerely,

A handwritten signature in blue ink that reads "David Barwell". The signature is fluid and cursive, with the first name "David" being larger and more prominent than the last name "Barwell".

David Barwell

AECOM, Chief Executive, UK and Ireland

10 THOUGHTS ON THE DRAFT LONDON PLAN

Our response considers 10 key areas that we think could be improved on in the next draft of the London Plan. Crucial will be delivery - an area that AECOM can help the GLA and other stakeholders improve.

- 1 CONNECT THE CITY REGION**
Thinking wider than the Greater London Boundary
- 2 MODERNISE THE GREEN BELT**
Enhancing the Green Belt to be more accessible to Londoners
- 3 LINK LOCAL TO STRATEGIC**
Neighbourhood Planning to facilitate delivery of new and appropriate housing
- 4 PROVIDE FOR THE COMMUNITY**
New delivery and housebuilding models for London
- 5 FUTURE LIVING**
Ensuring increased density works for all Londoners
- 6 BALANCING LAND NEEDS**
Create balance between industrial and residential land requirements
- 7 CONNECT TO THE WORLD**
Prioritise importance of London's airports as part of the city building process
- 8 RE IMAGINE TOWN CENTRES**
Ensure London's secondary centres and suburbs play a larger role
- 9 THE NEW LONDONER**
Adapt to changing workplace practices
- 10 CREATIVE DELIVERY**
Adopt new delivery mechanisms to ensure London meets its housing and infrastructure needs

1

CONNECT THE CITY REGION

Thinking wider than the Greater London Boundary

What you've said:

Policy SD2 Collaboration in the Wider South East encourages greater collaboration and joint working across the 'Wider South East' (WSE) to address regional and sub-regional challenges and opportunities. It embeds in policy the need for a strategic approach to planning and development in order to resolve issues linked to infrastructure delivery, environment (e.g. climate change) and the economy.

Policy SD3 Growth Locations in the Wider South East and Beyond aims to realise the wider city region by prioritising investment in strategic infrastructure to support housing and business development. Policy SD3 identifies 13 Wider South East Strategic Infrastructure Priorities, which have been endorsed by WSE partners, eight of which link with the identified Growth Corridors within London.

Our Thoughts:

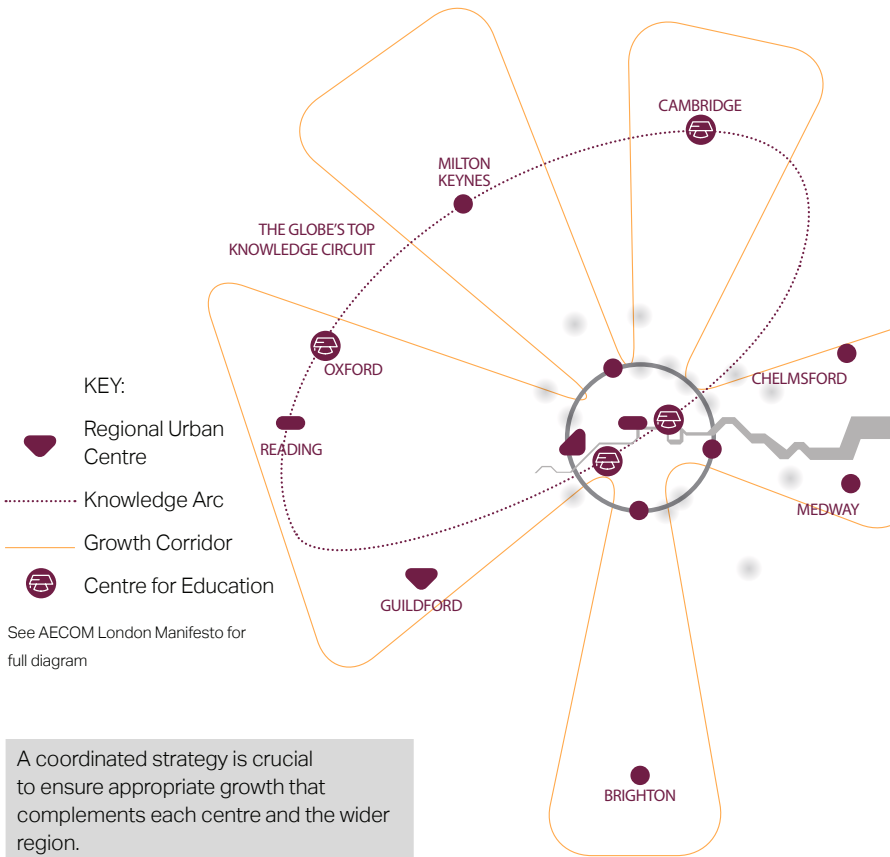
The recognition of a London City Region, linked by strategic infrastructure, is a step in the right direction to changing the spatial framework of London and meeting future growth requirements. We think there is an opportunity to strengthen this in the Plan.

AECOM identified in our London Manifesto the need for the Capital to **engage more with cities and towns** across the South East to meet growth targets, while encouraging the economic, environmental, educational and cultural offer of each regional centre. These regional centres have the **capacity to expand and provide the scale, critical mass and facilities** to attract a diverse and economically successful population.

By encouraging a **polycentric City Region, linked by strategic infrastructure**, the Capital's position as a hub of global integration and enterprise, with a network of specialised regional centres within 30-45 minutes from London and each other, will be enhanced.

How Can AECOM Help?

AECOM offers thought leadership for a London City Region, with our work creating the London Manifesto and response to the Thames Estuary Growth Commission.



A coordinated strategy is crucial to ensure appropriate growth that complements each centre and the wider region.

AECOM has been working with the National Infrastructure Commission to understand how to deliver a million new homes in the Oxford-Milton Keynes-Cambridge Corridor. At a strategic level, the Corridor can play a role in meeting London and the South East's housing and employment need, because it can be thought of as one side of a 'golden triangle' 'Oxford, Cambridge and London'. Radial links to London are just as important as future orbital connections linking Oxford, Milton Keynes and Cambridge in terms of housing markets,

commuting and economic function. Developments such as the Francis Crick Institute at King's Cross, are testament to the emerging science and technology corridor between Cambridge and London.

We believe that the Mayor should be more responsive towards strategic planning outside London's boundaries and how this will be delivered. This should focus on transformational investment in transport, in the event that the Plan's ambitious housing targets and strategic land functions cannot be met within London's own urban area.

2 MODERNISE THE GREEN BELT

Enhancing the Green Belt to be more accessible to Londoners

What you've said:

Policy G2 London's Green Belt states that the Green Belt should be protected from inappropriate development, whereby any proposal that harms it, will be refused. Only enhancement of the Green Belt to provide multi-functional uses for Londoners will be supported. In addition, the further extension of the Green Belt will be supported, where appropriate, while its de-designation will not.

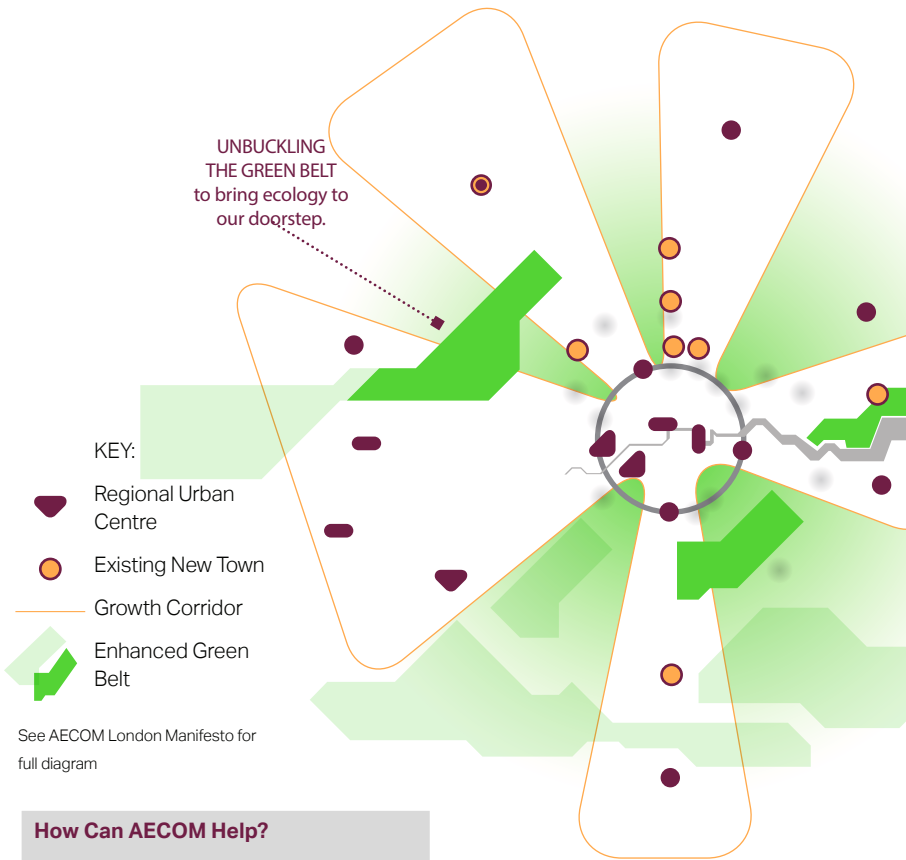
Policy G2 further states that despite some parts of the Green Belt not providing significant benefit to Londoners, this is not an acceptable reason to allow development to take place. Rather, an approach of enhancing access and improving quality is recommended.

Our thoughts:

AECOM is in favour of **protecting the best quality Green Belt**, as it provides ecological, recreational, air quality, and amenity benefits and assists in meeting long term risks associated with climate change.

The Green Belt is not an environmental protection policy, but a growth boundary. AECOM believes that a multi-functional **green infrastructure network that permeates the city will bring greater urban resilience** in the future, than the existing static Green Belt. This approach supports the objectives of the **National Park City** and Mayor's **Tree Planting Strategy**, which prioritises bringing green infrastructure into the city. In some cases, protecting accessible land close to London, which is of less ecological, recreational and amenity value is putting more environmentally valuable land at risk.

Modernising the purpose of the Green Belt is therefore crucial to balancing ecological quality and future growth. AECOM has identified that of the 515,000 hectares (ha) of Green Belt land, over 63,000 ha is located within 1 mile of a station and is potentially developable (outside of protection or flood risk).



How Can AECOM Help?

Should housing delivery fall below the levels anticipated, a strategic conversation between the GLA and the wider South East within London's functional economic region will need to take place, to ensure housing targets are met. AECOM believe there is a need to require local authorities - working in partnership with the GLA - to undertake a **Strategic Land Function Review** for the whole Metropolitan Green belt, whereby Green Belt land, housing land, Strategic Industrial land (SIL) and ecosystems are reviewed holistically to ensure that land use is optimised across the Capital.

AECOM has experience facilitating Duty to Co-Operate and other relevant conversations between planning authorities across the South East, as they seek to plan sustainably on a strategic scale. AECOM could support the GLA in developing the technical evidence base upon which this dialogue would rest.

AECOM could further advise the GLA on how to maximise the potential arising from links to locations across the wider South East suitable for strategic-scale housing growth, without significant Green Belt release.

3 LINK LOCAL TO STRATEGIC

Neighbourhood Planning to facilitate delivery of new and appropriate housing

What you've said:

Neighbourhood Planning is not discussed in relation to any London Plan policy, however it is mentioned in relation to *Good Growth Policy 1 Building Strong and Inclusive Communities*, with the identification that Neighbourhood Planning provides an opportunity to allow communities to shape their future.

While not directly mentioned, Neighbourhood Planning has the potential to respond to a number of Draft London Plan policies, including *Policy GG2 Making the Best Use of Land, Policy D2 Delivering Good Design, Policy H4 Meanwhile Use, Policy H5 Delivering Affordable Housing, Policy H10 Redevelopment of Existing Housing and Estate Regeneration* and *Policy H2 Small Sites*.

Our thoughts:

Neighbourhood Planning offers the potential to marry the **local level with the strategic priorities of the GLA**. The London Plan does not extensively discuss Neighbourhood Planning, however AECOM believes it offers a positive, direct and creative way forward to integrate community priorities into the planning process. Neighbourhood Planning can **support delivery** of affordable housing, different typologies, small sites, estate regeneration, and heritage preservation.

However, Neighbourhood Planning is challenging for communities in London, where tensions exist between local plans, neighbourhood plans and limited local resources required to achieve conformity with Local Plans. However, given the strong Government support, we think the London Plan should more actively encourage its support and role, not least in relation to smaller sites and estate regeneration

How Can AECOM Help?

AECOM is the principle subcontractor in the delivery of Neighbourhood Planning across England. We have supported over 500 groups, with a measurable shift in a pro-growth culture in communities involved. In particular we can support groups with complex issues to understand how plans can drive positive and proactive planning policies and design codes.

4

PROVIDE FOR THE COMMUNITY

New delivery and housebuilding models for London

The ageing profile of London's population to 2041

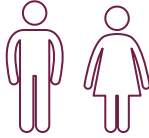
Source: ONS - Population Change 2011-2041

+14%



Children & Young
0-19 years

+22%



Working Age
20-64 years

+63%



Retirees
65-79 years

+105%



Elderly
80+ years

What you've said:

Policy GG4 Delivering the Homes Londoners need and *Policy H5 Delivering Affordable Housing* outline the London Plan's policy for the delivery of more homes, with a strategic target of 50% being affordable.

Policy GG4 further identifies the potential of new methods to home building, for example skilled precision-manufacturing.

Policy H6 Threshold Approach to Applications enshrines in policy a threshold approach to viability. This offers the opportunity to create certainty in affordable housing requirements and embed the requirements in land values.

Our thoughts:

London's population is undergoing significant changes, which will require new housing typologies and **delivery models that embrace each life stage**, while meeting issues of affordability.

Housing delivery models, such as **Direct Delivery** or **Self-Build** should be encouraged. Direct Delivery could allow public agencies to be directly involved in providing new affordable housing, whereas self-build models offer similar opportunities for individuals.

The promotion of **non-conventional housing construction techniques**, including factory production and on site assembly could complement self-build models and ensure different house types provision at affordable prices.

How Can AECOM Help?

AECOM has experience delivering prefabricated modular housing in Ladywell, Lewisham called Y:Cube. This provides self-contained and affordable accommodation for people looking to enter the housing market.

5

FUTURE LIVING

Ensuring increased density works for all Londoners

What you've said:

Good Growth Policy *GG2 Making the Best use of Land* encourages high-density, mixed-use development prioritised on Opportunity Areas, brownfield land and surplus public sector land, with a focus on catalytic development.

Policy D6 Optimising Housing Density requires development proposals to make the most efficient use of land and be developed at the optimum density through a design led approach with consideration of site context, connectivity and surrounding infrastructure. The capacity of existing and planned physical, environmental and social infrastructure to support new development should be assessed and where necessary improvements to infrastructure capacity be planned simultaneously to support growth. Density proposals should be based on the future planned levels of infrastructure.

Our thoughts:

With a target of 65,000 homes per annum, density should be seen as a **solution to maximising capacity** within London. However, the London Plan only considers the areas within its boundaries, despite the strategic focus on corridors and transport investment.

By concentrating densification in London, there is potential to create jarring contrasts between the existing urban pattern and new development. A **strategic regional outlook is required** to focus density along transport corridors and centres surrounding London.

Within London, the new design led approach is positive, however densifying above the existing urban pattern creates the **risk of having designs that do not meet place making, social infrastructure and open space standards**. This will be particularly acute in what is likely to be a fast paced process, with LPA's having little time to assess designs and proposals. In this context design/planning professionals will have to be extremely quick to respond, whilst having a solid understanding of the issues at stake.

High density schemes will be an emotive subject for established communities. The **perception that capacity of services,**



- 1. HIGHLY ACCESSIBLE**
- 2. AFFORDABLE HOUSING**
- 3. CLOSE TO GREEN SPACE**
- 4. DENSIFY AND BUILD UP**

social infrastructure, roads, transport, car parking and amenities will be surpassed to the point of failure will be very real for some. This has the potential to alienate communities and slow down the progress of schemes. Having solid strategies for community participation and engagement from the start will be a route to make higher density more acceptable.

How Can AECOM Help?

AECOM's multidisciplinary approach focuses on evidence based design and planning decisions. A site by site approach may deliver an increase in housing, but it must be sustainable for

communities to support transformational change. We have extensive experience developing regional strategies that understand how to appropriately apply densities in relation to place making, transport, social infrastructure and open space.

Our experience, including Old Oak Common, Charlton Riverside, Brixton Town Centre, Hackney Wick and Garden Towns and Villages, gives AECOM extensive knowledge in developing vision and design led frameworks across the South East that look to balance capacity, place making and social infrastructure.

6

BALANCING LAND NEEDS

Create balance between industrial and residential land requirements

What you've said:

Policy E4 Land for Industry, logistics and services to support London's Economic function seeks to ensure that a sufficient supply of land and premises for London's future industrial demand is maintained, and states that as a general principle there should be no net loss of industrial floorspace capacity across London; within designated Strategic Industrial Land (SIL) or Locally Significant Industrial Sites (LSIS).

Policy E5 Strategic Industrial Locations and Policy E6 Locally Significant Industrial Sites seeks to manage SIL and LSIS respectively to ensure appropriate industrial uses.

Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function seeks to encourage a plan-led approach to intensification, co-location and substitution of industrial sites. Whilst this could result in some industrial land, including SIL or LSIS, being lost, the intention is to achieve no net loss of industrial floorspace.

Our thoughts:

London's previous approach has been to deliver new homes on vacant industrial land. This has resulted in an over-release (circa 100 ha per annum over 5 years), despite increasingly strong demand. This **risks** future economic competitiveness.

Land values create a dichotomy, in which the importance of industrial land competes against higher residential development values. The Draft London Plan's response of no net loss of floorspace recognises a **changed approach** from land to floorspace capacity.

Delivery and viability will be challenging, however this approach offers an opportunity for creative **co-location and intensification** of industry and other uses.

How Can AECOM Help?

AECOM's pan-London experience provides us a unique understanding of the need to provide homes without undermining vital industrial and logistical functions.

AECOM prepared the London Industrial Land Supply and Economy Study (2015), informing this London Plan, which positions us to identify opportunities both in plan preparation and development needs, that coincide with the City for All Londoner's vision embodied within the new plan.

7

CONNECT TO THE WORLD

Prioritise importance of London's airports as part of the city building process

What you've said:

Policy T8 Aviation the mayor supports the case for additional capacity in the South East, recognising it is crucial to London's continuing prosperity and maintaining international competitiveness.

The Mayor further identifies that London's airports have a role in the spatial growth of London, whereby Opportunity Areas well connect to airports by public transport could accommodate significant new homes and jobs.

Our thoughts:

At a global scale, mega-cities with connected populations greater than 10 million are becoming more important than nation states, which will have profound implications for the way London develops. If we cannot **embrace global diversity** - connect to other mega-cities and emerging hinterlands thousands of miles away - we will not grow. Yet we must **balance this with local solidarity** in the face of global change and protect the characteristics of our neighbourhoods.

London must focus on strengthening our connections both globally and locally. Future growth in London will need to **address the underperforming areas around London's five busiest airports** - quarters of our city that have great catalytic potential but are overlooked.

How Can AECOM Help?

Airport expansion - essential for creating economic diversity in a globalising age - is critical for London and the UK to remain connected with growing regions. In addition to aviation capacity, the GLA must focus on designing, building, financing and operating successful Airport Cities - urban districts associated with airports. AECOM's capabilities include business case, benchmarking, masterplanning, infrastructure, place making and stakeholder engagement.

8 RE IMAGINE TOWN CENTRES

Ensure London's secondary centres and suburbs play a larger role

What you've said:

Policy SD6 Town Centres encourages the enhancement of London's town centres through the inclusion of a range of uses, including employment, business, shopping, culture, leisure, tourism, social infrastructure, residential and night-time economy. These centres should feature mixed-use and high density development, while being accessible by walking, cycling and public transport.

Policy SD6 Town Centre Network assesses the roles of town centres, whereby the focus for office, government buildings, international leisure and culture is focused in the metropolitan and international town centres, with smaller convenience retail, local office space and civic functions within District and Major Centres.

Our thoughts:

The London plan presents a rethinking of London's centres hierarchy. The CAZ is at saturation point, whereby London's secondary centres (the fringe and beyond) are **evolving with the delivery of new transport infrastructure** (e.g. Crossrail 1), and increased densification along strategic transport corridors. The role of these centres is shifting from back office space and retail, to **key centres** with growing economic (workspace) and entertainment functions, that were previously only available in the CAZ. This is **supporting changing workplace practices** and commuter flows.

By increasing density in the suburbs and maximising opportunities around tube and rail stations across suburban London, this could create revitalised centres with homes, workplaces and community amenities in close proximity to jobs.

How Can AECOM Help?

AECOM have extensive experience working with TfL assessing major infrastructure impacts on housing and employment across the wider region. In addition, AECOM is advising TfL on implications of increased density alongside transport solutions in developing secondary town centres.

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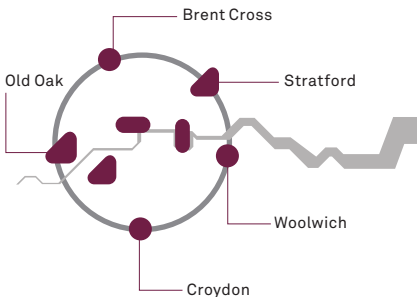
THE NEW LONDONER

Adapt to changing workplace practices

What you've said:

Policy SD5 Offices, Other Strategic Functions and Residential Development in the CAZ identifies that offices and other CAZ strategic functions are to be given greater weight relative to new residential development in other core commercial areas, including the City Fringe / Tech City Offices and CAZ strategic functions are given equal weight relative to new residential in the following areas: Vauxhall, Nine Elms, Battersea OA, Elephant & Castle OA.

These areas outside the CAZ are being encouraged to take on a greater function as the CAZ in terms of office, but with an equally strong residential offer. This will have an impact on commuting patterns and the way people will work in the future.

**Our thoughts:**

London's workforce is increasingly **prioritising flexibility**. This has led to a changing role and function of the workplace, with people able to work from home, the office or coffee shop and with the rise of the part-time Londoner.

Advances in technology, from wireless networks to mobile devices, are providing greater freedom to work anywhere.

London's ongoing centres hierarchy shift reflects changing priorities. The London Plan is placing increased importance on office and retail **growth outside the CAZ** in Stratford and Old Oak Common. Both centres are well connected and have the potential to function in a similar manner. AECOM believe that other centres including Brent Cross, Woolwich and Croydon will also begin to play a greater role, that will shift the priority from the CAZ to other accessible locations that offer similar needs to an agile workforce.

How Can AECOM Help?

AECOM provides expertise in research, advice and implementation in evolving workplace practices through our Strategy+ team in London. We have worked with private and public sector clients in delivering unique and flexible workspaces that accommodate changing needs of employees.

10

CREATIVE DELIVERY

Adopt new delivery mechanisms to ensure London meets its housing and infrastructure needs

What you've said:

Good Growth Policy GG6 states that increasing efficiency and resilience requires a more integrated approach in the delivery of strategic and local infrastructure, by ensuring that public, private, community and voluntary sectors plan and work together.

The London Plan identifies that between 2016 - 2050, the total investment required in London's infrastructure to be between £1 trillion and £1.7 trillion (2014 prices). In which the current level of committed funding will not meet London's growth needs, with the gap between public sector investment and committed funds to be around £3.1 billion per annum.

Due to the scale of the funding gap, the Mayor is exploring potential sources of funding, such as land value capture and looking at how private investors can play a bigger role investing in the upfront costs of infrastructure. Consequently, the London Plan has identified potential options of raising the required funding, including Fiscal Devolution and Sharing in Land Value Uplift whereby all beneficiaries of new infrastructure should contribute to funding transport.

Our thoughts:

London's scarcest resource is land, despite large areas of underutilised sites across the City. AECOM's work with London First and London Urban Transformation Commission (LUTC) has provided thought leadership and research into the issues of delivery of jobs and homes, as set out in the January 2018 report *Seizing the Opportunities*.

Delivery rates in the Intensification Areas (IA) and Opportunity Areas (OA) designated in 2004 are below planned outputs. In some areas, the lack of public sector investment and political drive has diminished development momentum. Nonetheless, OAs and IAs represent 16% of the GLA area; London should continue to focus their urban potential.

How Can AECOM Help?

AECOM's research is one of the first independent performance assessments of London Plan OAs and IAs. AECOM research related completion rates and new job creation provide invaluable evidence on delivery and implementation providing invaluable evidence on delivery and implementation, including which designations offer the best rate of return, where development should be left to the market, what other areas need intervention and which funding mechanisms have the best track record.

HOW CAN AECOM HELP

AECOM's recent research into the Future of Infrastructure surveyed over 500 senior industry decision makers to understand the problems, priorities and potential in delivering major infrastructure projects

Building the Resilient Future

It is easy to get excited about the future. When considering transportation, for example, we all like to imagine a world of autonomous cars, digital railways that anticipate and help improve reliability, and Hyperloop links to usher in a whole new way of travelling.

Yet autonomous cars need roads to drive on, and digital rail systems and Hyperloop links have to interact seamlessly with legacy transport networks. The public sector who own the infrastructure, as well as those entrusted with delivering new projects, must find ways to keep pace with technological change. This will require clear, long-term thinking from both central and local government. Private-sector providers will also need to be incentivised to help find solutions for a growing array of complex problems across society to ensure people's needs are met.

We need to be ensuring that we upgrade existing networks and systems, as well as create new ones to embrace innovation in

the ways we work and the infrastructure we rely on. This will ensure that the infrastructure we create is resilient and future proofed to help withstand the shocks and stresses to come.

There are signs that the Government is realising the need for innovation. The UK's Digital Built Britain, launched in 2015, encourages widespread adoption of new technologies and industry approaches, while the National Infrastructure Commission (NIC) has explored how artificial intelligence can increase productivity across the infrastructure network.

How AECOM can help

AECOM have the experience and expertise within London and across the South East to deliver key strategic infrastructure and provide thought leadership on the future of London. This has seen AECOM work with both public and private sector partners to deliver some of London's key infrastructure projects over the past 20 years.

See more at: www.infrastructure.aecom.com

10 BIG IDEAS THAT THE LONDON PLAN SHOULD ADDRESS

These are additional areas that we believe are missing from the Draft London Plan, that we believe will change how we interact with city and our communities in the future

- 1 DRONE CORRIDORS**
Regulation of traffic patterns in the air and use of air space, which are already being designated in other cities, including Singapore
- 2 AUTONOMOUS VEHICLES**
Autonomous vehicles could lead to the future extension of our commutes, ensuring logical road networks will facilitate this development
- 3 ARTIFICIAL INTELLIGENCE**
Tomorrow's smart city will increasingly use AI to provide information and interact with people
- 4 HYPERLOOP**
Consideration for its potential strategic connections within London and to the wider City Region
- 5 LOGISTICS IN THE CITY**
Decentralised hubs throughout the city, facilitating last mile delivery from hubs in dense central locations
- 6 ALTERNATIVE CAR FUELS**
Infrastructure to support electric or hydrogen cars and what do we do with defunct petrol stations
- 7 VIRTUAL REALITY**
Increase opportunity for remote working that will allow for greater integration of life and work
- 8 FUTURE PROOFING ENERGY**
Our technological advances are increasingly exponential, we need to future proof London future energy needs
- 9 INNOVATIVE FARMING**
Indoor vertical farming, hydroponics, and aquaponics adjacent to urban centres
- 10 NEW HOUSING TECHNIQUES**
New housing techniques related to modular housing or 3D printing will become increasingly common and provide more affordable housing

AECOM is built to deliver a better world. We design, build, finance and operate infrastructure assets for governments, businesses and organisations in more than 150 countries. As a fully integrated firm, we connect knowledge and experience across our global network of experts to help clients solve their most complex challenges.

Our London team provides fully integrated planning, design, engineering and management capabilities, to help make places better.

For more information:

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