



Cross River Partnership (CRP) and ATCM Collaborative Response to the London Plan

Introduction

On the 24th January 2018, CRP and ATCM were delighted to support a London Plan consultation event, hosted by Team London Bridge, and jointly delivered by CRP and ATCM London.

The event was chaired by Councillor Wendy Hyde of the City of London Corporation and Co-Chair of CRP. Planners within the GLA and TfL presented key elements of the London Plan before conducting an open Q&A with Local Authority town centre managers, BIDs, planning officers and transport consultancies, discussing everything from delivering affordable housing to the potential impact of autonomous vehicles on the city.

Cross River Partnership (CRP) delivers projects for inner London with its eight Borough and 19 Business Improvement District, or BID, partners.

The Association of Town and City Management (ATCM) is a membership organisation open to town centre managers and BIDs across the UK and Ireland. This includes a London-based network bringing together public, private and voluntary sector organisations.

The collaborative response below has been drafted by CRP-ATCM, taking on board all of the comments made at the consultation event. The response has been structured around each of the Chapters and numbered Policies within the draft London Plan.

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1. Planning London's Future (Good Growth Policies)

We share and support the six broad Good Growth principles that guide the Plan.

We welcome the ambition and broad thrust of the draft London Plan, and its emphasis on “Good Growth - sustainable growth that works for everyone, using London’s strengths to overcome its weaknesses”. We also welcome the strong connections between the development of London’s economic competitiveness with the quality of its environmental and social wellbeing.

We recognise that the draft London Plan proposes some ambitious targets for the city’s growth, primarily in terms of housing, but also in terms of employment space and other cultural, leisure and hospitality amenities in the CAZ and the wider Town Centre Network. This is all in addition to the growth of the rail network that is already underway. We champion mixed-use centres as a route to vibrant, multi-functional local economies and believe this is a worthwhile ambition.

However, in practice, the Good Growth policies can contradict each other if there is poor delivery. For example, through Permitted Development Rights, we have seen how the introduction of housing can undermine an economy with the direct loss of employment space. Achieving balance will be essential to achieving the aspirations of Good Growth.

In this context, the process for delivery is critical. We are keen to see the GLA, local planning authorities, transport operators and developers/investors engage with, and where appropriate, deliver schemes through public-private partnerships including town centre partnerships, BIDs and the Cross River Partnership. These bodies bring significant advantages to shaping London’s evolution, including:

- *Acting as a sounding board for coordinated consultation with key stakeholders and business community to develop a united vision that will be championed locally;*
- *Facilitating communications from GLA to key stakeholders on decisions taken and the development process;*
- *Early identification of key issues that might impede or undermine development/intensification;*
- *Support in delivering/protecting affordable employment space and identify opportunities for co-location maintaining London’s reputation as a city of enterprise;*
- *Minimising disruption for existing users of the CAZ and Town Centre Network by shaping developments or communicating with key stakeholders; and*
- *Early identification of key issues and opportunities that might support the development process, contributing to cost effective schemes delivered in a timely fashion.*

We are therefore conscious that achieving the London Plan's objectives depends on delivery. We are keen to partner with the Mayor and others to be an exemplar for delivery that sets the standard for other parts of the capital. We are also keen to work with the Mayor to ensure effective implementation and enforcement of the Plan's provisions.

Policy PD6 on Town Centres is welcome, although the Plan should better recognise the strategic importance of business-focused hubs and clusters.

The report itself lacks commitments to supporting business clusters towards the perimeter of the CAZ, and the Town Centre Network – we would be keen to see an ambitious plan for commerce beyond the CAZ boundary. Strong commercial hubs across London, utilising the potential offered by the Town Centres Network creates employment opportunities across the city, easing the pressure on our transport network, reducing air pollution and strengthening the development of communities, as opposed to dormitory suburbs.

Policy GG1: Building strong and inclusive communities (p 13).

Policy GG2: Making the best use of land (p 15).

Any Policy that increases the care with which land use is determined, especially in Inner London where its relative scarcity raises its value, is to be welcomed. However, it is important that the level of local discretion on specific planning decisions in relation to smaller areas of land, which do not have wider strategic significance, is not reduced as a result of this Policy.

Policy GG3: Creating a Healthy City (p 17)

It would be particularly useful to take account here of the role of Business Improvement Districts (BIDs) in the delivery of this Policy in local areas where they are established: working with their host Borough, they can improve the quality of streets in line with this Policy.

Policy GG5: Growing a Good Economy (p 21)

Policy GG6: Increasing Efficiency and Resilience (p 23)

2. Spatial Development Patterns

Policy SD1: Opportunity Areas (OAs) (p 30).

The designation of specific Opportunity Areas (OAs), linked to the location of newly planned transport infrastructure projects, is welcome. The difficulty will come if the Mayor's approach to a specific OA requires expenditure by the Borough concerned, for which it does not have the available funds.

The analysis could be widened to consider how central government might underwrite long-term, transformational projects (e.g. infrastructure investments) within particular Opportunity Areas. For example, via the use of seed funding – via a TIF – for mixed use office and residential units.

A process for full consultation on the relevant issues will be essential to ensure that development opportunities do not themselves pose large and ongoing threats to town centre prosperity.

For example, the planning and phasing of the Crossrail 2 infrastructure project at Wimbledon OA must be managed carefully to ensure the vitality of the town centre is maintained throughout the period of construction, otherwise the potential of the OA will not be realised.

It would be helpful if the London Plan could provide greater clarity over the definition of specialist clusters. For example, London Bridge is variously recognised separately (e.g. paragraph 2.4.12) or combined with South Bank and Bankside (Figure 2.16, paragraph 7.5.11) or with Southbank (paragraph 7.4.12) or with Borough and Bankside (Figure 2.16). It would therefore be helpful to clarify the areas where London Bridge is identified as a specialist cluster and/or Opportunity Area when brigaded with other areas.

Policy SD4: The Central Activities Zone (CAZ) (p 66).

The strong support in the Plan for the distinct nature of the Central Activities Zone (CAZ) is certainly welcome. The importance of this Zone for the overall prosperity and well-being of the whole of London should not be underestimated. All the facets of the Zone described accurately and fully in the Plan highlight this.

Policy SD4 CAZ, industry and logistics space within or close to the CAZ. This is already difficult. Creative solutions are required to ensure that the necessary space is provided, and that more sustainable logistics functions are facilitated within the CAZ e.g. smaller spaces for micro consolidation can support new developments, off-street loading and unloading bays should be required.

Policy SD4 CAZ. More F Retail clusters, in addition to the West End and Knightsbridge already mentioned, more should be included e.g. South Bank, The City, The Strand, Victoria etc to ensure appropriate development and protection.

Policy SD5: Offices, other strategic functions and residential development in the CAZ (p 75).

Commercial, Strategic and Cultural priorities - the importance of these being prioritised over residential in the CAZ cannot be over-emphasised, including where there are recognised specialist clusters. However, office development should not be prioritised at the expense of other strategic CAZ functions, including development that supports residential communities.

The Mayor's commitment to work with boroughs and support them to introduce Article 4 Directions to remove office to residential permitted development rights across the whole of the CAZ and the Northern Isle of Dogs (and those parts of Tech City and Kensington & Chelsea lying outside the CAZ) is strongly welcomed. This re-enforces and highlights the crucial importance of the CAZ + as a business-orientated area. Conversions of office and industrial property to residential would deprive the Zone of potential for developing much-needed new space.

Policy SD6: Town centres (p 78)

The continuation of a Town Centres First Approach to resist damaging out-of-town development is welcome.

As is agglomeration of uses in town centres including Evening and Night Time Economy and cultural assets.

We support the sentiment behind Policy SD6 and believe this is a strong statement about London's Town Centre Network.

We recommend that it is recognised in The London Plan that vital and viable town centres across London, with a mix of services and employment opportunities become sustainable communities in themselves, reducing the need for people to travel across the city with positive ramifications for issues such as congestion, air pollution and capacity. Promoting a 'work local' campaign for businesses alongside a 'shop local' initiative would be welcomed.

Policy SD7: Town centre network (p 81)

Policy SD8: Town centres: development principles and Development Plan Documents (p 86)

We fully support the commitment to the Town Centres First Approach, as realised via the sequential approach with accompanying impact assessments. For Outer London, this is particularly important as Out-of-Town development can significantly damage the viability of nearby centres, undermining ambitions to improve opportunities for local walking, cycle networks and public transport. In an era where digital technology has grown in influence, there are limits to the amount of physical retail that can be sustained. Town centre retail must be established as a priority.

Policy SD9: Town centres: Local partnerships and implementation (p 90)

We support the emphasis placed on ‘Local Partnerships and Implementation’. Town centres, as recognised in The London Plan, are areas of density with diverse land-use and a strong commercial presence. Therefore, development and intensification will be more challenging, especially where development threatens to damage London’s rich culture, heritage and character. Local intelligence will be critical to achieving ambitious, yet sensitive intensification, that will prevent the unintentional loss of key economic drivers.

While we welcome this emphasis on town centre partnerships, we ask the Mayor to recognise the diversity and breadth of work undertaken by these bodies. Policy SD9 must reflect that such partnerships can support the delivery of many of the ambitions outlined in The London Plan, from better evening and night-time economies, improved air quality, encouraging sustainable transport modes and protecting London’s heritage. Supporting high street retail remains a core function of these partnerships but their involvement in other elements of the economy and society is varied and bringing their local intelligence to the fore is essential.

We also recommend that, in the context of the delivery of The London, fostering the evolution of these partnerships to include landowners is crucial. In many areas, London’s transformation will be radical, so ensuring there landowners are involved will be essential. This is demonstrated in principle by Policy SD9 C 1) b and c which are only achievable through landowner involvement and demonstrated in practice by the three Property Owner BIDs in Central London, who provide a strategic element to London’s regeneration and renewal.

Such strong partnerships are not the exclusive preserve of Inner London. In Outer London, we note the emerging partnership between the Royal Borough of Kingston Upon Thames and the BID, Kingston First, which includes a Landowners Forum. It is this kind of multi-functional, cross-sector partnership that the Mayor needs to support and foster across the city.

To foster these partnerships, the Mayor will need to explore best practice in various public-private partnership models, assess any impediments to their growth and work with various stakeholders to resolve these impediments and promote their growth across London.

3. Design

Policy D1: London's form and characteristics (p 98).

The overall Policy stated here is welcome. However, this policy does not reflect the diversity of London's form and characteristics. It will be essential, however, that its implementation is left substantially in the hands of Boroughs, and it does not lead to the Mayor becoming involved in what will often be invariably be local planning decisions. The Policy should be amended to cover this point.

Policy D7: Public realm (p 122).

The overall Policy stated here is again welcome. However, there are two main challenges which are not given due recognition. First, the question of the funding of the specific policies is not covered substantively and it is not clear how the requisite funding can normally be obtained. Second, again there is a risk that this will lead to the Mayor becoming directly involved in the detail of essentially local planning and development decisions. It will be important to guard against this. The Policy should be amended to deal explicitly with both of these issues.

In addition, it would be beneficial to recognise explicitly in this section of Plan the role of Business Improvement Districts (BIDs) in managing and improving the public realm in their individual areas, working closely with their respective Boroughs. Strong partnerships, with good engagement from landowners, can make a tangible difference both in terms of funding public realm enhancements and positively shaping local planning and investment decisions.

There could be a case for formalising BIDs' influence over Borough economic development plans (e.g. incorporating their input into the review/sign-off process).

It would also be beneficial if the Policy was broadened to embrace a wider approach to local assets which includes Placemarks, not all of which will be heritage assets.

D7 Public Realm Page 123. Green Infrastructure in public realm and on carriageway; open street events; free drinking water are welcome innovations.

Camden Town Unlimited BID is leading a locally crowd-sourced campaign for a green route (the Camden Highline). This will effectively be privately financed but publicly accessible, so is a good example of an 'independent initiative delivering a public good, like the proposal for a Camden Highline'.

Railways Arches – The Low Line

The geography of London is significantly affected by the railways which define significant routes, boundaries and barriers throughout the city. These include very significant stretches of railway arches that can provide an important economic opportunity as well as walkways and other routes to improve access and permeability.

The London Bridge Plan identifies the railway arches through the area as part of a “Low Line” which stretches across borough boundaries. The London Plan has an important role to play in realising the potential of railway arches because of the way in which they span in individual borough responsibilities. They can help meet the London Plan’s objectives for affordable workspace (Policy E2), improved public realm (Policy D7) and healthy streets (Policy T2). This multiple role is often overlooked.

The River Thames

It would also be beneficial for the management of the River Thames and the Thames walkways, if their role in the public realm was acknowledged here. Although the statement in para 9.14.8 (p 367), that the River Thames should not be designated as Metropolitan Open Land, is welcome and this should remain the position, a statement here about the role of the River Thames would be appropriate.

The River Thames is the defining landscape, historic and natural feature of London. We believe it should feature more strongly in London Plan policies and that more emphasis is given to addressing routes along it and the positive economic, social and environmental contribution it makes. The London Plan has a particularly important role in providing a coherent approach given the Thames passes through so many boroughs.

We welcome that “use and enjoyment” of the Thames is identified as a strategic function of the Central Activities Zone and some protection afforded the Thames from tall buildings in Policy D8 and in strategic views (Policy HC3). Policy SI14 is especially welcome in encouraging the identification of Thames Policy Areas.

We recommend that Policy D7 is amended explicitly to recognise the importance of the public realm provided by and along the Thames, including specific reference to the need for expansive, continuous public access to the riverfront.

The River’s potential in terms of freight movements should also be recognised and supported at appropriate points in this draft London Plan.

Policy D12: Agent of Change (p 136).

We support this policy as an important protection for existing night time economy venues.

Policy D13: Noise (p 139).

This section could have more commitment to addressing noise generated by freight and other traffic. There is significant potential for this to be minimised by increasing cycling and walking for individual journeys; as well as facilitating cycle couriers; freight portering schemes and increased uptake of electric vehicles.

4. Housing

Policies H1-18: set out the housing policies contained in the Plan (p 144). We have not commented on these as neither CRP nor ATCM are directly involved in housing delivery.

5. Social Infrastructure

Policy S1: Developing London's social infrastructure (p 202).

This Policy and the subsequent ones in specific areas (S2- S7) are generally to be supported and undoubtedly both Boroughs and other relevant organisations, including Business Improvement Districts (BIDs), will wish to follow them.

However, they present two problems, common with some other Policies in the Plan. Firstly, it is often not clear from where the necessary funding will come – and the Plan does not really acknowledge this as an issue.

In addition, the implementation of these Policies in specific cases, e.g. the provision of public toilets, could involve the Mayor becoming excessively involved in detailed policy-making at a local level, rather than concentrating on overall strategic objectives. It would be helpful if the relevant Policies in this chapter were amended to reflect these two concerns.

Policy S1 could also be strengthened by giving greater recognition to the role played by new development in supporting social infrastructure via new employment and training, apprenticeships, social housing and investment in culture.

6. Economy

Policy E1: Offices (p 224).

This overall Policy should be supported. The inclusion in it of a requirement that Boroughs should consult upon and introduce Article 4 Directions to ensure that the CAZ and other relevant areas are not undermined by office to residential permitted development rights, is crucial to maintaining and enhancing the inner London economy. Given the strategic importance of its continued success, this Policy, in particular, is fully supported.

In the context of expiring permitted development rights, the Plan should set out a firm commitment to supporting Boroughs representing key strategic pockets, within or outside the CAZ, in securing Article 4 Directions. We hope this can be reconciled with ambitious plans for affordable housing in London (e.g. a 66,000 home target).

It is encouraging that the GLA is prioritising efforts to maintain office floorspace – but the plan needs a more robust approach to addressing the challenge of making a total 5 million sqm available by 2041.

The majority of companies in the capital rent, so non-property owners are getting pushed further out of more desirable places to do business.

Policy E2: Low-cost business space (p 227).

The provision of sufficient space for smaller businesses is vital. However, the Policy does not acknowledge that – especially in the CAZ - there may be conflicts when new large-scale developments are proposed, which, while beneficial for the overall economic prosperity of the London, have the immediate impact of reducing space for small and start-up businesses, as a site is assembled and cleared for a new, larger development. The Policy should be amended to allow – at least in the CAZ – for this exemption to be applied in clearly defined circumstances.

Policy E2 – we are supportive of, and would like recognition given to, the potential roles of railway arches, subways, tunnels and basements in contributing to the delivery of Policy E2, and their role in securing economic objectives. Please see <https://crossriverpartnership.org/projects/light-at-the-end-of-the-tunnel-let/> OR <https://crossriverpartnership.org/media/2014/09/LET-Celebration-Document.pdf> for successful case studies.

Policies E2 & E3 – we are supportive of efforts to provide affordable business space and extend this to retail - small floor plates and the benefits of retail diversity could be further highlighted.

Policy E3: Affordable workspace (p 230).

The draft should reflect the fact that flexible and affordable workspace is critical to supporting the start-up economy, and should be at the heart of ‘making the best use of land’.

A number of BIDs support or represent initiatives involving the use of ‘meanwhile space’ where land earmarked for development can be temporarily turned into a co-working environment.

We welcome Policy E3 setting out that the GLA will encourage Boroughs in their Development Plans to consider more detailed affordable workspace policies. However, further detail on how it will approach this would be helpful.

Policy E5: Strategic Industrial Locations (p 239).

Policy E8: Sector growth opportunities and clusters (p 252).

Policy E11: Skills and opportunities for all (p 263).

This Policy is strongly supported. A cross-London approach to tackling the issue of skills is undoubtedly right. However, it is essential not to lose the degree of local discretion and flexibility, which enables an effective Policy to work well, with some influence being left with individual Boroughs, BIDs and skills trainers and providers.

For example, the London Borough of Tower Hamlets has already assessed the potential skills gaps that may emerge post-Brexit in the sectors that serve Canary Wharf and surrounding areas (such as retail, hospitality and construction) and is exploring how to remedy this, through education, training and apprenticeships.

This Policy could be amended to reflect the need to recognise and manage differences that may arise between a pan-London approach and a necessary level of local discretion.

It is essential that this Policy reflects the outcome of the recent consultations on the Skills for Londoners document published by the Mayor.

The reference in the Policy to use of Section 106 Agreements to advance the level of skills is welcome. However, it would be useful to amend the Policy on this point to acknowledge that sometimes this can best be done by developers employing apprentices training others, through Section 106 Agreements. This could be applied not just in the immediate vicinity of a particular project, but wider afield in the relevant part of London.

This policy also affords the opportunity to explore the benefits that flexible and affordable workspace can deliver. There are multiple benefits accruing from the ‘meanwhile use’ of space earmarked for future development or demolition, in terms of what they bring to start-ups and the creative economy. Specifically this is a collaborative environment that promotes innovation and entrepreneurialism.

7. Heritage and Culture

Policy HC1: Heritage conservation and growth (p 268).

This Policy deserves full support in principle. However, it should be amended to reflect concerns that if Boroughs are responsible for implementation, it could require resources beyond those available in the current climate for public spending.

Policy HC1 should embrace a wider approach to local assets which includes Placemarks, not all of which will be heritage assets.

Policy HC2: World Heritage Sites (p 278).

Policy HC3: Strategic and local views (p 280).

The Thames

We welcome that “use and enjoyment” of the Thames is identified as a strategic function of the Central Activities Zone and protection afforded the Thames in strategic views (Policy HC3).

Policy HC4: London View Management Framework (p 285)

Policy HC5: Supporting London’s culture and creative industries (p 287).

This Policy is welcome. It will be essential, to maintain local discretion to determine the location and boundaries for the Quarters and Zones and the activities which they may encompass. This point could usefully be included in the Policy.

Policy HC6: Supporting the night-time economy (p 292).

The current Mayor’s policy for the night-time economy is welcome, as is its re-enforcement here. The policy should, however, be amended to reflect the differences between the local impact of individual night-time venues and activities, for example, those involving alcohol and those that do not. In some case, undoubtedly, the latter will be advantageous, while the former will be less so. The Policy should allow for this discretion.

From a management perspective, the impact of night-time venues and activities differs considerably depending on whether alcohol is sold on-site. Issues such as policing/security, transport, dispersal and clustering of premises are all treated differently depending on the selling of alcohol.

8. Green Infrastructure and Natural Environment

Policy G1: Green infrastructure (p 302).

The full implementation of this Policy is likely to present major budgetary challenges to Boroughs and others in the current public spending climate. It is important that the Plan sets out realistic achievable policies, so the Policy could helpfully be amended to reflect the severe financial constraints for local authorities in this area, which will prevent them providing the full range of services that the Policy ideally requires.

Policy G5: Urban greening (p 308).

The Plan's introduction of an Urban Greening Factor to be built into all applications over a certain size is certainly welcome. The Policy could perhaps usefully give further attention to retrofit greening of existing urban landscapes too, and the potential funding sources / incentives thereof. Explicit linkages with the Mayor's Health and Inequalities Strategy and associated policy measures e.g. green / social prescribing, could usefully be emphasised here. CRP and BIDs would be very happy to undertake any pilot initiatives on this on behalf of the Mayor.

An existing example includes the specific benefits that the Camden Highline will bring i.e. providing an environmentally friendly and healthy link between business zones in Camden and King's Cross, making use of old and abandoned infrastructure.

The Policy could also usefully be amended to reflect the role of the River Thames in London's green infrastructure. This is covered in Policy SI14 (Chapter 9 Sustainable Infrastructure) but could also productively be covered here too.

5115 9.11.3 – Developers should always consult the Thames Path Management Officer before proposing any extension, signage or alteration of the Thames Path.

9.14.7 – The Mayor should require a joint strategy for the Chelsea Bridge to Tower Bridge section.

Page 308. Open space categorisation. Add: Alongside existing and elevated railway lines to linear open spaces (e.g. of High Line project in Camden).

9. Sustainable Infrastructure

Policy SI1: Improving air quality (p 320).

There is undoubtedly a need for practical measures across the CAZ and the city as a whole to reduce air pollution triggered by intensive land-use, a congested road network and construction.

CRP has a great deal of experience of designing and delivering these interventions in partnership with Borough and BID partners e.g. www.clickcollect.london; www.deliverBEST.london; www.maryleboneLEN.org; www.cleanairroutes.london; www.frevue.eu

Policy SI2: Minimising greenhouse gas emissions (p 324).

This policy is necessary and welcomed, but should specifically state that action taken to reduce greenhouse gas emissions should not adversely affect local air pollution (e.g. installation/burning of renewable fuels such as woodchip). It is also noted that the establishment and administration of a carbon offset fund, however laudable, will represent another additional cost on Boroughs.

Policy SI3: Energy infrastructure (p 329).

Undoubtedly, this Policy is welcome. However, it fails properly to recognise that major difficulties also arise with the energy utility companies. This is partly because of the policies followed by the latter, but more significantly because of the regulatory regime governing how they are allowed to respond to new developments, as envisaged here. There is a mention of this in para. 9.3.8 (p 333), but this point needs to be recognised more clearly in the Policy itself. It is quite likely that, to achieve the Policy's objectives, changes to the regulatory regime may be required.

Policy SI6: Digital connectivity infrastructure (p 341).

The importance of this issue for London's continued economic success internationally needs to be stressed more and the Policy could usefully highlight the detriment to London from failures to enhance the quality of the digital infrastructure across the capital. In a considerable part of the economically crucial areas of London, including the CAZ, digital download speeds are unacceptably low.

In addition, the Policy should be amended to recognise the crucial role played here by both the major providers of digital/broadband services and the regulator, Ofcom. They have been repeatedly challenged to make improvements in the service in London and although some progress has been made, it is far from satisfactory.

Policy SI14: Waterways - strategic role (p 363).

This emphasis on riparian Boroughs working together is welcome overall. However, the Policy could beneficially be strengthened by specifying a requirement on the Mayor, working jointly with the Boroughs, perhaps via Cross River Partnership (CRP) to draw up an overall Thames Strategy for the management of the River Thames across Greater London. This agreed strategy could then provide the basis for borough Thames Strategies and local development plans.

So while Policy SI14 is especially welcome in encouraging the identification of Thames Policy Areas, further guidance on the specific policy content for Thames Policy Areas in Borough Local Plans and neighbourhood plans would be welcome. It would also be welcome if mention was specifically made of the inland waterways that are linked to the River Thames.

Policies SI16 and SI17: Waterways – use and enjoyment; and Protecting London’s waterways (p 371 and p 733).

These policies are both welcomed.

10. Transport

All of the comments below on Transport should be read in conjunction with CRP's submission to the Mayor on his draft Mayor's Transport Strategy.

Policy T1: Strategic approach to transport (p 402).

Page 357, 9.10.4. Supports railheads for sustainable movement of aggregates. Railheads should be considered for movement of other goods too.

On Strategic Infrastructure, there may also be a case for considering how London can pay for major infrastructure and transport projects without businesses – that rent, and do not own, their workspace – footing the bill. This has been the case with Crossrail, because of funding schemes like the business rate supplement, and Crossrail 2 will potentially extend this mechanism.

The Policy T1 might also consider how 'efficiency and resilience' can be achieved by making use of existing infrastructure e.g. railway arches and viaducts, under-used spaces alongside, underneath and on top of them.

It is most welcome that the Mayor will work with the electricity industry, Boroughs and developers on supply – this is needed, there are major capacity issues.

Policy T2: Healthy streets (p 403).

The overall intention of this Policy is strongly supported. Both Boroughs and Business Improvement Districts (BIDs) are already engaged with implementing the Mayor's Healthy Street Approach. It would be helpful, however, if the Policy explicitly recognised the inter-linking nature of this and other Policies, especially on transport.

We regard the Healthy Streets approach as a particularly important initiative, that can be potentially transformative for the sense of 'place' in areas of London.

While the Policy on reducing traffic and parking could obviously contribute to achieving this Policy, it should also refer to the statement in Policy T6 (para F) that adequate provision should be made for efficient deliveries and servicing and acknowledge that the ability for deliveries to be made smoothly and efficiently can affect the amount of traffic adversely (Policy T7), if access to specific locations is made more difficult.

In short, a careful balance will need to be struck on these issues and it would be helpful if the Policy explicitly recognised this.

Railways Arches – The Low Line

The geography of London is significantly affected by the railways which define significant routes, boundaries and barriers throughout the city. These include very significant stretches of railway arches that can provide an important economic opportunity as well as walkways and other routes to improve access and permeability.

The London Bridge Plan identifies the railway arches through the area as part of a “Low Line” which stretches across borough boundaries. The London Plan has an important role to play in realising the potential of railway arches because of the way in which they span in individual borough responsibilities. They can help meet the London Plan’s objectives for healthy streets (Policy T2).

The role of railway arches in contributing to the delivery of Policy T2 should be explicitly recognised.

Policy T3: Transport capacity, connectivity and safeguarding (p 406).

The Thames

The River Thames is the defining landscape, historic and natural feature of London and the crossing at London Bridge was the origin of the city. We believe it should feature more strongly in London Plan policies and that more emphasis is given to addressing routes on and along it and the positive economic, social and environmental contribution it makes. The London Plan has a particularly important role in providing a coherent approach given the Thames passes through so many boroughs.

We request that there should be an amend to Policy T3 to establish an intention to provide expansive, continuous public access to the riverfront, address any gaps in provision and support the Thames Esplanade through central London.

Policy T4: Assessing and mitigating transport impacts (p 412).

Policy T4 should be expanded to consider the assessment and mitigation of impacts wider than those felt exclusively by the transport network. Transport schemes of a sufficiently large scale could mean significant disruption in some areas that entail the loss of key assets for the city.

This could be overcome if a collaborative approach to delivering Development Plans was adopted with BIDs and other local partnerships working with local planning authorities, GLA, TfL and DfT on shaping major transport infrastructure to the benefit of the capital. Unfortunately, we have seen proposals for infrastructure in London that have been insensitive to the important local assets that contribute to the city’s international reputation.

In Camden, the HS1-HS2 surface link threatened the world famous markets. In Wimbledon, the setting for one of the world’s most renowned sporting tournaments, Crossrail 2 poses similar risks as discussed under Policy SD1. On both occasions, BIDs have sought to find viable solutions to bringing projects forward in a way that complements the needs of the local area.

Using the local intelligence of these business-led partnerships at the earliest stage of Development Plans may allow the Mayor to protect key assets in the future, whilst enhancing transport projects, minimising the disruption and reducing long-term costs to the city by getting proposals right first time.

It is also critical that built up areas facing the challenges of construction or noise pollution, are supported.

Policy T5: Cycling (p 414).

Policies that support cycling becoming an easier and more desirable transport mode are widely supported. Provision of adequate capacity of cycle parking is not always easy to retro-fit to denser parts of the city. The policy should encourage large scale developments to provide capacity for neighbouring areas.

The focus on improving cycling facilities off-street within developments is welcomed; and that any on street cycle parking provision is where necessary and appropriately located.

The inclusion of delivery of cycle routes is welcomed, in liaison with local stakeholders (including Boroughs and BIDs) to ensure appropriate placement. This will ensure that any physical infrastructure, or increased use of cycle routes does not adversely impact other desirable modes including walking.

The Policy could also consider reference to other cycling facilities including inclusion of showers and lockers in new commercial developments for staff and visitors.

Policy T6: Car parking (p 420).

It would be beneficial if this Policy also included a specific reference to the need substantially to increase the provision in parking areas of suitable recharge points for electric vehicles. The reference to the electricity supply constraints in para 9.3.8 (page 333) under Policy SI3 could also be covered here, given the likely rising importance of this issue over the next decade.

Policy T6 on Parking, Page 421. Adequate provision should also be made for efficient deliveries and servicing. More force is needed here e.g. requirement for provision of off-street loading bays.

Policy T6.2: Office parking (p 426).

We are supportive of offices in the CAZ being car-free, due to the concerns about air quality and the need to support sustainable forms of transport.

Policy T7: Freight and servicing (p 430).

This Policy is welcome. However, it raises again the issue of the provision of charging points for electric vehicles and this needs to be inter-linked with the references in other Policies and the difficulties around securing sufficient electricity supplies.

One of the recently growing areas of deliveries is items purchased through online shopping by individual members of staff and arrangement for delivery to their office address during

the daytime. Para E of this Policy could usefully refer explicitly to this new and growing issue.

CRP's Click. Collect. Clean Air.' behaviour change campaign promotes the use of click & collect services that consolidate deliveries to collection points close to consumers' homes. Analysis of deliveries to participating businesses in central London has shown a reduction in personal parcel deliveries of an average of 50%, and service provider data has shown that 90% of redirected parcels are delivered outside of Zones 1 & 2 where air pollution is the worst.

This Policy should be supported by stronger language encouraging new freight logistic and consolidation infrastructure. Recognition is needed and should be retained, but there is a need for coordinated planning of new infrastructure. A strategic approach is also needed to upscale projects that CRP and its partners have piloted e.g. buyers' clubs, consolidation hubs etc.

CRP has been leading the preparation of an area-specific Freight Deliveries and Servicing Action Plan for the West End Partnership. This will drive projects for area-wide collaboration within the CAZ.

The Policy should be strengthened by mentions of how to deal with the last mile of logistics specifically.

Policy T9: Funding transport infrastructure through planning (p 436).

It is recognised that particular mechanisms for funding major infrastructure projects will often be controversial. Businesses across London are likely to be expected to pay increased sums through these routes over the period of the Plan. It is essential, therefore, that the details of the use to which the funds will be applied, the time periods for the payments and the overall budgets for the relevant projects are all fully transparent. The Policy should include an obligation on the Mayor to provide this information in a timely way.

Given the long time period of the Plan, this Policy cannot be separated from new sources of funding envisaged by the Mayor and being sought from central government. These include devolution of certain taxation powers, as recommended by the London Finance Commission, and the exploration of new sources of finance from sharing in land value uplift. Both these approaches are described in paras 11.1.58 – 11.1.65, but could also usefully be included in this Policy.

Additional Comments

There is a broader point to be made around leadership and delivery, including enforcement, of the London Plan. It signals significant changes on a wide range of issues and a combination of inertia, lack of resources and Borough resistance may mean that relatively little changes quickly on the ground.

There are also some calls to update the current use classes so that they better reflect organisations existing within the current / emerging economy.

There seems to be no reference to the incompatibility of residents living cheek by jowl in a 24 hour thriving city. This can lead to conflicts between business and residential communities, which The London Plan could play a role in resolving.

Finally, there doesn't seem to be much attention given to lighting in the draft London Plan and the transformative potential effect in relation to a 24-hour city.

Further Information

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