

COVENT GARDEN

capco

Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
Post Point 18
London SE1 2AA

2nd March 2018

Dear Sir,

The new London Plan (Draft for Consultation December 2017) Representations on behalf of Capital and Counties

We are writing on behalf of Capital and Counties Plc (Capco), owners and stewards of the largest parts of the Covent Garden District in central London.

Over the past 10 years Capco has invested heavily across Covent Garden both in terms of major developments, including the comprehensive mixed-use redevelopment of Kings Court (and over 30 other developments) and public realm, both in terms of delivery and management of the District.

Capco are active members of London First and the Westminster Property Association. We are fully supportive of the representations made by the Westminster Property Association (London Property Alliance) and London First, but wanted to make specific written representations reflecting Capco's Estate.

General comments

Capco fully supports the Mayor and GLA's strategic vision for "Good Growth" across the City including Policy GG2 seeking the best use of land and higher density development in the most accessible locations.

In the Central Activities Zone (CAZ) we fully support the Plan's ambition and targets for economic growth from all sources of commercial development including offices, hotels and retail/leisure. This will be critical in optimising the economic growth both in London and Nationally, and in meeting the Mayor's employment targets.

We welcome the new London Plan's policies towards local approaches to mixed-use policy allowing for greater flexibility. In the heart of the CAZ, it is essential that mixed-use policy is sufficiently flexible given the very high existing asset values and the need to encourage rather than restrain commercial uses and particularly hotels, retail and leisure uses.

COVENT GARDEN

capco

In relation to both mixed-use and affordable housing policy it is essential that in the heart of the CAZ, there is inherent flexibility in relation to off-site solutions including through land use swaps and payments in lieu. We support reference to land use swaps and credits in paragraph 2.5.8 but consider that payments in lieu should not only be for exceptional circumstances in the CAZ.

In the absence of this flexibility, development and commercial growth is unlikely to come forward. It is particularly important that flexibility for off-site and payment solutions are provided for in the CAZ, in accordance with the GLA's CAZ Supplementary Planning Guidance.

We are fully supportive of the identification of the West End, including Covent Garden, as an International Shopping District within the new London Plan and Policy SD4 which seeks to enhance the vitality and viability of the International Shopping District. We agree however with the Westminster Property Association that the strategic CAZ diagram 2.16, should not just reference the West End under "arts, culture and entertainment", but also retail and offices reflecting its strategic role and function.

Covent Garden is identified within the West End International Shopping Centre and is a major retail centre in its own right with a substantial number of internationally renowned retail tenants and an exceptionally high quality environment which attracts 45 million visitors per annum.

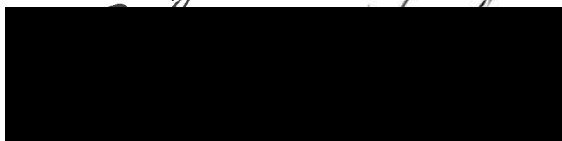
Critical to the success of retail centres in central London is the environment for shoppers and visitors and the public realm quality which, together with high quality restaurants, encourages visitors as part of the wider experience which competition, in the form of the internet, cannot offer. In this context the new London Plan policy SD4 (h), which encourages public realm improvements, should actively support pedestrianisation or shared spaces where appropriate, to reduce traffic movements during core hours and enhance pedestrian accessibility and attractiveness. Encouraging urban greening is also a key element of this approach and assists with improving air quality in line with the Mayor's aims and other London Plan policies. Capco is in the process of preparing its own Environmental Masterplan in support of these policies.

Increasingly, there are significant retail and mixed commercial use concepts emerging within London, reflecting its global status, which represent a fusion of different uses and do not sit neatly with the outdated Planning Use Classes Order. It is very important from a retail and growth perspective that these uses are recognised and supported in a planning policy context in the same manner as more traditional retail uses.

We fully support Policy HC6 in supporting and promoting London's night time economy as part of a global city, whilst balancing amenity considerations.

We trust that our comments will be taken on board. Do contact me directly if it would be useful to discuss in any more detail.

Yours sincerely,



Andrew Hicks
Estate Director, Covent Garden