

DP4577

2 March 2018

Sadiq Khan (Mayor of London)
Draft London Plan
GLA City Hall
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Dear Sir

REPRESENTATIONS TO THE DRAFT LONDON PLAN

ON BEHALF OF HB REAVIS UK LIMITED

These representations to the new Draft London Plan are submitted on behalf of our client HB Reavis UK Limited (“HB Reavis”).

HB Reavis is an integrated pan-European developer operating in the United Kingdom, Poland, the Czech Republic, Slovakia and Hungary. Their London development programme comprises four major schemes including the recently acquired Elizabeth House site at Waterloo in LB Lambeth. Planning permission was granted on the site in 2015 for a major office-led mixed-use development with accompanying enhancements to the surrounding public realm and works to alleviate capacity constraints at the adjoining Waterloo Station.

HB Reavis supports the ambitions of the Mayor’s Draft London Plan and the principles of Good Growth, informed by the six Good Growth policies. The following comments are submitted in relation to specific policies contained within the Plan:

Policy CG2 Making the best use of land

HB Reavis supports policy CG2, which seeks to prioritise the development of Opportunity Areas, brownfield land and sites which are well-connected by existing or planned transport infrastructure. We note that achieving these objectives will enable other objectives to be met, such as the protection of London’s open spaces from development. HB Reavis also particularly supports plans for good local walking, cycling and public transport connections and enabling car-free development that allows efficient use of land, as well as using new and enhanced public transport links to unlock growth.



Policy SD1 Opportunity Areas

HB Reavis supports policy SD1 in particular the stated aim to ensure that Opportunity Areas fully realise their growth and regeneration potential. However, we wish to question the indicative guidelines for housing and employment capacity for the Waterloo Opportunity Area set out in figure 2.11 – Central London. This has been reduced from 15,000 jobs and 2,500 new homes within the current London Plan to 6,000 jobs and 1,500 new homes within the Draft. We support the continued regeneration of Waterloo to provide new homes and jobs so that the area can realise its full potential, and wish to understand the reason for this reduction in the capacity of the Waterloo Opportunity Area unless it takes into account new homes and jobs already delivered in the current Plan period.

Policy SD4 The Central Activities Zone (CAZ)

HB Reavis supports policy SD4 which recognises that the nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values.

We also support Part H which states that the attractiveness of the CAZ should be enhanced through public realm improvements and the reduction of traffic dominance, and Part I which states that infrastructure to sustain and enhance the CAZ and its agglomeration of strategic functions including its public transport and digital connectivity and its potential to accommodate new development should be secured.

Policy SD5 Offices, other strategic functions and residential development in the CAZ

HB Reavis supports policy SD5 which recognises the importance of offices within the CAZ and which states that offices and other CAZ strategic functions are to be given greater weight relative to new residential development in core commercial areas of the CAZ, including Opportunity Areas.

Policy SD7 Town centre network

HB Reavis supports policy SD7 which emphasises that the changing role of town centres should be proactively managed in relation to the town centre network as a whole, in order to support sustainable economic growth across the Greater London boundary to enhance the vitality and viability of London's centres.

Policy states that identified deficiencies in the London town centre network can be addressed by promoting centres to function at a higher level, designating new centres or reassessing town centre boundaries. In terms of designating new centres, Figure A1.1 within Annexe 1 shows the Future Potential Changes to the Town Centre Network.

HB Reavis considers that given the regeneration potential and strategic importance of Waterloo within Lambeth, the Mayor should give consideration to designating a CAZ Retail Cluster at



Waterloo in order to support Waterloo's role within the CAZ as a business, retail, residential, cultural and tourist destination, and recognising its Opportunity Area designation to deliver significant numbers of new jobs and homes.

Policy D7 Public realm

HB Reavis supports policy DP7 which states that development proposals should contribute to the achievement of high quality public realm. We support policy text which states that proposals should be based on an understanding of how the public realm in an area functions [...] and where barriers to movement create severance for pedestrians and cyclists (in order to improve these).

Policy D2 Delivering good design

HB Reavis supports and promotes good design and considers that it is an important factor in creating high quality new workplaces. However, we are concerned that policy D2 (in particular Part F which provides that boroughs and applicants should use design review to assess and inform design options early in the planning process, and that design review should be in addition to the borough's planning and urban design officers' assessment and pre-application advice) is difficult to achieve when not all boroughs have a design review function. We also consider that the suggestion within Part H for local planning authorities to use architect retention clauses in legal agreements where appropriate is too onerous. Architect retention clauses should only be used in exceptional circumstances when only one particular architect can deliver the design that has been secured, and even then they must always be flexible enough to avoid prejudicing commercial discussions.

Policy D8 Tall buildings

HB Reavis supports the recognition within policy D8 that tall buildings have a role to play in helping London accommodate its expected growth as well as supporting legibility across the city to enable people to navigate to key destinations. HB Reavis also supports the supporting text which recognises that tall buildings can form part of a strategic approach to meeting regeneration and economic development goals, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities.

Policy E1 Offices

HB Reavis supports policy E1 which calls for improvements to the competitiveness and quality of office space of different sizes to be supported by new office provision, refurbishment and mixed-use development. We also welcome Part B which supports increases in the current stock of offices and the recognition of the CAZ as a unique agglomeration and dynamic cluster of world city businesses.

Policy E2 Low-cost business space



Whilst we support the ambitions of policy E2, we are keen to ensure that low-cost business space is pursued in a manner which adds to rather than compromises the provision of high quality commercial office floorspace that is required in order to maintain London's global competitiveness. We therefore support the proportionate and site-specific approach set out in E2, which recognises that not every B1 office site or building will be appropriate for this type of accommodation, but there where it is appropriate and can meet an identified demand, provision will be encouraged.

Policy E3 Affordable workspace

As for policy E2 above, we support the ambition of policy E3, but wish to ensure that it is applied in a manner which does not compromise commercial office space on prime office sites where that space will contribute towards London's global competitiveness. This could include, for example, consideration of off-site solutions if a local demand for a certain type of affordable workspace is identified which is incompatible with open market commercial office space.

Policy HC2 World Heritage Sites

HB Reavis recognises that the protection of World Heritage Sites (WHS) and their settings is an important objective of the Plan, however we believe that in accordance with the approach advocated within NPPF, policy HC2 should reflect the need for development with the potential to affect a WHS or its setting to be considered against any public benefits that would be delivered by the development proposal. London as a World City faces development pressures that require the protection of its heritage alongside continuing modern development, and where there is an opportunity for new development of outstanding quality to deliver significant public benefits, particularly where those benefits can only be delivered on very specific sites, such opportunities must be taken.

Policy T1 Strategic approach to transport

HB Reavis welcomes policy T1 which states that development proposals should support the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. We also support policy text which states that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

Policy T3 Transport capacity, connectivity and safeguarding

HB Reavis supports policy T3 which provides that the Development Plans should develop effective transport policies and projects to support the sustainable development of London and the Wider South East as well as to support better national and international public transport connections.



Part D of policy T3 states that in Development Plans and development decisions, priority should be given to delivering upgrades to Underground lines, securing Crossrail 2, the Bakerloo Line Extension, river crossings and an eastwards extension of the Elizabeth Line. This is welcomed however we also believe that further network and station capacity and access improvements to Waterloo Station should be recognised as being of similar importance, in particular where they can relieve existing congestion bottlenecks.

Waterloo Station is central to London's continued growth and its success as a World City. It is London's busiest station, with 200 million people passing through each year. But it is at capacity, with passenger numbers set to increase with the re-opening of the former Eurostar terminal platforms and other platform lengthening works. Its accesses and public spaces are constrained, of poor quality and risk passenger safety unless they can be improved.

Therefore, we believe that improvements to Waterloo Station and the enabling development that redevelopment and improvement of surrounding sites would deliver, should also be identified as being a priority within the policy text, or included as a high priority item within Table 10.1 – Indicative list of transport schemes.

Policy T6 Car Parking and T6.2 Office parking

HB Reavis support the overall approach to reducing car parking and in particular welcome the aspiration for car free office development in central London. We also support the need for operational parking being determined on a case by case basis. It would also be of benefit to recognise in the plan that blue badge parking may not be necessary where fully DDA compliant public transport services are available, as would be the case at Waterloo.

Policy T5 Cycle parking (including Table 10.2)

HB Reavis welcomes the strategy to encourage more cycling across London as this will contribute hugely to the health and wellbeing of London and will reduce congestion. However we have some concerns about the cycle parking standards being sought, particularly for major office development in central London. In some cases basement excavation can be constrained by underground conditions and utilities, with the cost of excavation often being prohibitive making schemes unviable. We request that the plan recognises that in these exceptional circumstances there may be a case to relax the cycle parking standards. We would also like to promote the use of foldable bicycles as a means to achieving mode shift targets and we would like to request that an amendment is made to the plan which recognises that they can make a significant contribution towards achieving the cycle parking standard.

We respectfully request that our representations are considered. Should you require any further information, please contact Jonathan Smith of this office.

Yours sincerely

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