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28 February 2018

Dear Sir/Madam

Response to Draft New London Plan

As a Business Improvement District, we represent over 200 businesses comprising a wide mix of office, retail and leisure businesses that are located on and around Edgware Road from Marble Arch to Paddington in central London.

We support the broad Good Growth principles that guide the draft Plan but want to be assured that the Mayor himself is going to abide by them in relation to the Inner Ring Road where the priority given to traffic exceeds that given to pedestrians, confining their movement and enjoyment and dividing the communities on either side. We support Policy GG1 and particularly part C on ensuring that streets are planned for people to move around and spend time in comfort and safety. This is particularly important for us as Edgware Road suffers from poor and insufficient crossing facilities across it and across its side roads. This inhibits the success and growth potential of this important shopping and eating out district. We are not unique in our position on the Inner Ring Road and we look forward to the Mayor bringing forward proposals to implement this policy in our area and in similar neighbourhoods on the strategic road network.

We are concerned that the approach towards the CAZ needs clearer support and greater recognition given that it is the driver of the London economy with its intensity of businesses and huge employment location providing nearly two million jobs for Londoners and beyond. It also generates supply chains for businesses throughout the city, providing important business to SMEs throughout London. The Plan also lacks commitments to supporting business clusters towards the perimeter of the CAZ which includes our area. There is no evidence in the Plan to downgrade the growth forecasts for the Edgware Road (south) town centre compared to the current London Plan, and we would support a policy approach that promoted commercial growth in and around our area, particularly given the loss of office space to residential over the last three years.

We support the policy requiring boroughs to bring forward Article 4 Directions to restrict the loss of office space to residential allowed under the General Development Order. However, we would also ask that consideration be given to protecting offices from conversion and redevelopment to hotels. In our area, we have seen three separate proposals to convert office space to hotels in the last year and are concerned that if this trend continues, our current mixed economy will become overly reliant on the visitor economy with the consequent impact on local shops and services.

Policy SD5 and Policy E1 should also encourage the addition of extensions to existing office buildings and that these should take precedence over and above views from Conservation Areas unless they can be shown to have a particularly harmful impact. Extensions to buildings inside Conservation Areas will always

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be more contentious than outside Conservation Areas, and given the extent of Conservations Areas in and around our BID, to achieve any office and commercial growth must mean generally allowing extensions on sites not in Conservation Areas. But our experience is that such extensions to commercial buildings are often thwarted merely because they are visible from nearby Conservation Areas. We would suggest that Policy E1 should allow for modest extensions to commercial premises on sites outside Conservation Areas unless they have a really significant impact on rather than simply changing the current view. There have also been instances where we think that the impact of servicing has also been used to refuse proposals when such impact is in reality minimal.

We support the approach taken by Policies SD6 to SD8 although we question why the growth potential and the night time economy cluster have both been downgraded for our area that the plan recognises as the Edgware Road South centre. We have well over 100 eating out venues in our area, including a renowned concentration of restaurants offering a wide range of Arabic cuisines which attracts people from all over London and from overseas, particularly during the summer.

We welcome Policy HC6 but it would be helpful if there was a distinction between evening uses (up until say midnight) and night time activities as the former are much less likely to affect residents getting a good night's sleep. In addition, the Policy would be better if it differentiated between NTE activities that are alcohol based and others. Our NTE is based around eating out and there are only very rare instances of drunken behaviour, which are limited in any event to the odd individual and not large groups of drunken adults.

We are concerned that the Plan should take a stronger approach to tackling short term lets. We have a huge number of short term lets that have taken over permanent residential flats within the large mansion blocks in our area. These are not a new problem but are being fuelled by London's booming gig economy. While they contribute to demand for restaurants and late night entertainment, they can have a devastating effect on communities where they become intensified and outstrip regular residential uses. They can also harbour organised crime, such as vice and trafficking. The plan should have a clear policy preventing the use of residential premises as short term lets. The Plan might usefully have a policy that promotes the development of properly designed short term lets in appropriate locations.

Finally, we are concerned that the draft plan overlooks the ability of neighbourhood planning to deliver the Mayor's aspirations. We are a member of two neighbourhood forums and believe that the plan largely ignores and perhaps even forgets the role that neighbourhoods and their plans have in the planning system (para 0.023 refers to a two tier planning system when since the 2011 Act London has a three tier planning system). Given the role that neighbourhood planning has in bringing forward housing sites, and particularly small sites, and perhaps also town centre strategies, the Plan should positively support neighbourhood planning.

I would be happy to discuss these comments with you if required.

Yours sincerely,

A solid black rectangular box used to redact the signature of Kay Buxton.

Kay Buxton
Chief Executive

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