

## LONDON PLAN

A submission by Team London Bridge on the public consultation draft  
January 2018

1. Team London Bridge is responsible for the London Bridge Business Improvement District. We welcome this opportunity to shape the emerging new London Plan. This is a critical strategic land use document and we are keen to ensure it complements the needs and aspirations of the business community in London Bridge.
2. Our own strategic vision is set out in the London Bridge Plan and this informs our submission. The aims and projects of the London Bridge Plan have developed out of local public consultation with over 300 businesses and 400 individual comments, as well as taking into account existing and emerging local and strategic planning and economic strategies. The Plan was developed following a second BID extension to 2021 which was won in 2015. A copy is enclosed.
3. We work closely with Southwark Council on planning and development issues and have supported development of the new Southwark Plan which is now at a late stage of development. We are particularly supportive of the London Bridge Area Vision which it contains while also identifying some areas for improvement in the new Southwark Plan as a whole.
4. Team London Bridge welcomes the ambition and broad thrust of the draft London Plan. Its emphasis on *“Good Growth - sustainable growth that works for everyone, using London’s strengths to overcome its weaknesses”* mirrors much of our own approach for London Bridge. We also welcome the strong connections between the development of London’s economic competitiveness with the quality of its environmental and social wellbeing.
5. This submission focuses on some important areas where we believe the London Plan can be strengthened specifically in respect of the London Bridge area. We are collaborating with other Business Improvement Districts over the wider approach of the London Plan to our areas of interest.
6. We are also conscious that achieving the London Plan’s objectives depends on delivery. We are keen to partner with the Mayor and others where London Bridge can 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.

### **Town centre network**

7. We support recognition of London Bridge as a Retail Cluster in the Central Activities Zone (Table A1.1).
8. We do not support the classification of London Bridge having “medium” residential growth potential. This is not consistent with its location in the Central Activities Zone as both a retail cluster and a specialist cluster because of its arts, cultural and creative businesses and activities. The success of these roles will require careful balance to be struck with other competing uses and within the London Bridge area we believe a clear priority needs to exist for commercial office, retail and leisure uses over residential. This is consistent with Policy SD5 C of the draft London Plan which states *“Offices and other CAZ strategic functions are to be given greater weight relative to new residential development in other core commercial areas of the CAZ.”* These other areas include London Bridge because of its dual role as a cluster and as an Opportunity Area.

9. The Strategic Housing Land Availability Study informing the London Plan also fails to identify significant capacity on large sites in the London Bridge, Borough and Bankside area (Figure 4.15). In our experience the potential from small sites is also low given the importance of the area's retail, cultural and office role.

#### Recommendation

- London Bridge to be reclassified as having “incremental” potential for residential growth

#### **Growth potential and Opportunity Area**

10. We support recognition of London Bridge as having “high” growth potential (Table A1.1) and being identified as an Opportunity Area (Figure 2.16). This is confirmed by our own analysis of demand in the London Bridge area. The London Bridge Plan seeks to ensure *“London Bridge will become the retail core for the borough of Southwark and the commercial core for London. A strong local economy will be bolstered by a mix of commercial users, tourism and local spend. Retail opportunities will expand, incorporating both traditional high street occupiers with local, independent fare that diversifies the district and provides an improved overall offer throughout London Bridge.”*

11. We share the London Plan's recognition of London Bridge as a specialist cluster because of its arts, cultural and creative businesses and activities.

12. It would be helpful if the London Plan could provide greater clarity over the definition of such clusters. 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) .

#### Recommendation

- Clarify the areas where London Bridge is identified as a specialist cluster and/or Opportunity Area when brigaded with other areas

#### **Night time economy**

13. London Bridge is ideally situated to support the growth in the night time economy. Its central location and diverse leisure and cultural offer (as noted in Paragraph 2.4.9) combine with a major public transport hub, night tube services, a major railway station completing a major investment programme and a relatively small residential population which makes it one of the few locations where further growth can be supported without significant amenity issues.

#### Recommendation

- Recognise London Bridge as having an International/National role (NT1) in the classification recognised in Policy HC6 and set out in Table A1.1

#### **Railways arches – The Low Line**

14. 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.

15. 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 Plans objectives for affordable workspace (Policy E2), improved public realm (Policy D7) and healthy streets (Policy T2). This multiple role is often overlooked.

#### Recommendation

- Recognise the role of railway arches in contributing to the delivery of Policy D7 and Policy T2 as well as Policy E2 and their role in securing economic, public realm and access objectives in an integrated way

#### **The Thames**

16. 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 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. The London Bridge Plan emphasises the importance of the connections along the river and promotes the Thames Esplanade to *“seamlessly connect London Bridge’s riverfront and Pier into Bankside to the west and the rest of The Queen’s Walk to Tower Bridge to the east, creating a riverwalk connection that will form a continuous path along the Thames.”*

17. 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.

#### Recommendations

- Amend Policy D7 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
- Amend Policy SI16 and 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, including London Bridge
- Provide further guidance on the policy content for Thames Policy Areas in Borough Local Plans and neighbourhood plans to support Policy SI14