

**Consultation response**

Thank you for the opportunity to comment on the London Plan. The Northbank BID is one of London's largest business improvement districts and represents over 250 local businesses in central London. It is home to London's major visitor attractions and a centre for culture, education and innovation as well as quality hotels, restaurants and world class businesses. Northbank has world-class culture, vibrant nightlife, rich architectural history and is a centre of innovation, education and creativity. We are working to reinvigorate this part of the capital with collaborative working, to enhance the infrastructure and champion sustainable growth.

We are working closely with Westminster City Council and TfL to develop strategic improvements for the area including, the Aldwych Vision as a new public space, streetscape enhancements and Low Emission Initiatives with a Business LEN. These will benefit the local community by providing safe and pleasant streets which encourage walking, are safe to cycle in and healthy.

Business engagement has identified common concerns for area safety, reduced investment in infrastructure and the challenges of transport, congestion, pollution which all need an approach suitable for central London. Strategic support also desired to bring forward solutions to keep economy thriving and able to attract visitors, clients and business from across the world.

These aspirations are echoed across the CAZ area and we are working collaboratively as part of the West End Partnership and with neighbours in Covent Garden, the City of London and Camden.

To enable a focus on the matters that are most important to the Northbank BID area, comments are concise and set out under headings that relate to the relevant consultation questions asked by the draft London Plan. As appropriate, reference is also made to specific draft policies and proposals.

Overall, the Northbank BIDs is supportive of the Mayor's Good Growth vision, including the emphases on reducing motor traffic, on enabling more people to walk and cycle more, on tackling poor air quality, and on the 'Healthy Streets' approach. It needs to meet the challenges that future technologies are bringing to the public streets and transport modes with the opportunities for efficiencies and sustainable. Good growth will ensure suitable investment is made for a sustainable infrastructure to support a thriving economy.

**London's business improvement districts work with many businesses and can perform a strategic function for a collective business voice.**

## **Chapter 1: Planning London's Future (Good Growth Policies)**

### **Policies GG 3, 5, 6**

Increased support for health through an active lifestyle which is delivered through investment in streets and green spaces.

The Northbank BID area has a rich architectural heritage with grade 1 listed buildings, unique streetscapes and internationally renowned public spaces. We have worked with local stakeholders on a number of projects to improve the quality of the streets: Aldwych and Villiers Street.

The Aldwych vision is an opportunity to unlock more and enhance the area at Somerset House, Kings College and the cluster of creative businesses. This in-turn would allow the area to develop an integrated community in one of London's busiest areas.

The area has a unique mix of arts, culture, education and law with diplomatic and civic functions combines with communities of local school, churches. The business community is particularly diverse with technology, financial sectors and hospitality industries well represented.

The Aldwych vision would enrich London with wide reaching benefits by linking specialist clusters and notable historic areas Temple, Royal Courts of Justice, Inns of Court, LSE & Kings College and Covent Garden and the South Bank with Whitehall & Westminster to City of London. (connected routes and spaces).

The River Thames is an up-tapped area for improvement and could be shaped for enhanced health, transport and biodiversity as well as an enhanced destination.

## **Chapter 2: Spatial Development Patterns**

### **Policy SD 4, 5, 6**

The Northbank is one of London's most central areas so supports investment in infrastructure that facilitates business operations and a growing economy. The London Plan recognises the diverse functions of central London and the many challenges. We would like to emphasise the challenges for the CAZ and the need to tackle them as a priority. This would benefit a high number of people due to the dense employment and high numbers of visitors.

Central London needs to attract new businesses with a thriving economy and as a healthy location for staff. Further investment is needed to deliver improvements to distribution, freight and servicing to support the needs of business and a strategic plan to deliver it.

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 SD6 on Town Centres is welcome, although the Plan should better recognise the strategic importance of business-focused hubs and clusters.

## **Chapter 3 Design**

### **D1: London's Form and characteristics – area based strategies (p98)**

Suitable encouragement and enforcement is needed for sustainability, air quality, noise and efficient deliveries that minimise the negative impacts. (A 9, 10)

Area considerations for heritage and street character could be combined with sustainability and health considerations. This allow for ongoing improvement and also step change for operations as part of public realm enhancement schemes improve streets for occupiers and property owners.

### **Policy D7: Public Realm, D10: Safety, security & resilience to emergency**

We support policies D7 and would like include the needs of future technology, area management to reduce crime and antisocial behaviour. Area resilience is a high priority for Northbank area to ensure businesses and people are safe.

- Funding
- Working with Boroughs and BID as driver for public realm enhancements
- Public realm design that encourages sustainable choices and behaviour change

#### D7: 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.

### **Chapter 5 Social Infrastructure**

#### **Policy S5: Sports and recreation facilities**

Areas for play, relaxation are scarce in central London, we supports the design of parks to incorporate areas for all ages to enjoy. They are encourage wildlife, are safe and stimulating. We recognise that spaces may need to be adapted to ensure they are well used and suitable for all the local community to access and enjoy.

### **Chapter 6: Economy**

#### **Policy E1: Offices, E2 - E4 Land for industry, logistics and servicing, E8: Sector growth opportunities and clusters, E10: Visitor infrastructure, E11: Skills and opportunities for all**

We are supportive of the provision of a range of sizes of work space to encourage enterprises to start and expand. The provision of sufficient space for smaller businesses is vital. However, the Policy could 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 businesses, as a site is assembled and cleared for a new, larger development.

While central London will be costly, its good transport links and proximity to like minded businesses means that flexible working space will deliver growth. Ensuring central London is appropriately serviced is a high priority with many pilot projects to look at delivery and service planning undertaken by London BID’s. The space should be suitable for all types of business including creative and artist studio as well as technology needs and available with flexible terms.

### **Chapter 7 : Heritage & Culture**

#### **HC1: Heritage, conservation and growth, Policy HC3: Strategic & Local Views, Policy HC5: Support London’s Culture and Creative industries.**

Northbank has a diverse range of heritage assets and we are working with Westminster City Council and local stakeholders to enhance the surrounding streets to improve the setting. Creating a high-quality public realm and environment has been a priority of The Northbank BID since its inception.

- Appropriate placemaking in Conservation areas and near to heritage assets.
- We recognise that some assets surroundings can be visually improved and provide greater access.

Views bring visitors to the area provide a significant contribution to the image of and character of London. The views from the River Thames embankments and bridges (Waterloo and Golden Jubilee Footbridges), along the Strand and to heritage buildings such as RSA, Savoy, the churches. We support the on going protection of views and improvement

The Strand Aldwych area has many cultural assets and is home to creative clusters based in and around Somerset House. Proposals to enhance Aldwych will bring fuller collaborative working and will provide the opportunity for outdoor cultural events.

We support this in alignment with Policy E2, Low-cost business space, Policy E4 Land for Industry, Logistics and Services to support London's economic function and Policy E8: Sector growth opportunities and clusters.

- Supporting culture with events, exhibitions and learning to – world centre
- Supporting the cultural industries with increased opportunities for collaboration, exposure to partnerships and finding. Suitable work space with flexibility for growth

### **Chapter 8: Green Infrastructure and environment**

Plants and trees in the centre of the city are a cherished asset. We are working with business partners, building developers and asset owners to enhance existing and increase greening in the area.

We understand the need for suitable management strategy for existing mature tree assets and work proactively with both Westminster City Council and Transport for London to identify suitable management regimes. Local businesses value the benefit trees bring but also wish to be consulted for the best way to manage trees that impact them directly.

We are also working with partners to enhance existing green spaces and identify new ones, including Embankment Evergreen, a green wall at Embankment Station and Victoria Embankment Gardens. We are developing new opportunities for greening at street level, roofs and walls within MAQF and the Aldwych Business LEN. GLA support, expertise, funding and grants are vital bring new projects to hard to deliver locations in central London. This also increases the cumulative effect of green corridors and Urban forest with biodiversity, flora and fauna.

### **Chapter 9: Sustainable Infrastructure**

Improving central London's sustainability is important to the Northbank business community to provide a healthy place for staff to work and clients, visit.

We are working on air quality initiatives, with Westminster City Council and local stakeholders which has been enabled by both MAQF and Business LEN funding. Funding, and support for a wide range of initiatives is essential to keep momentum.

This includes the freight, servicing and healthy streets aspects also within this consultation.

The awareness of the issues could be increased further by harnessing the GLA and TfL communications channels.

Air quality issues could be supported with broader communications campaign to inform individuals and businesses about mitigating factors to reduce exposure, and reduce levels of pollution. An easy to understand 'toolkit' could be considered for wider distribution to organisations.

Wider sustainability goals for 2050 are supported and we look forward to seeing more detail about the interim steps.

**Water:** Infrastructure investment for sustainable water supply and drainage

**Policy SI6: Digital connectivity infrastructure** (p 341) is a priority for businesses with the need to support ongoing improvement with suitable street infrastructure. The considerations of what the future demands of future innovations. The importance of this issue for London's continued economic success internationally needs to be stressed more. CAZ digital download speeds should be improved.

## **Chapter 10: Transport**

**Policies: T1: Strategic approach to transport, T2: Healthy Streets, T3: Transport capacity, connectivity and safeguarding, T4: Addressing and mitigating transport impacts, T5: Cycling, T6: Car Parking, T6.1 Residential Parking, T6.2: Office Parking T6.3: Retail Parking, T6.4: Hotel & Leisure Parking, T7: Freight and servicing, T9: Funding Transport infrastructure through planning**

Supporting and investing in London's transport system is a priority for businesses to thrive. This in combination with the Healthy Streets approach will ensure London is able to function competitively and sustainably. The plan supports the reduction of dependency on cars and promotes change to more sustainable modes of: walking, cycling and public transport with the associated benefits of improving air quality and reduced congestion. New developments need to consider impacts on local transport and build in appropriate mitigation.

T5: Cycling needs to be a viable mode of transport for all with suitable provision of parking, both on and off street with options that are suitable for busy central London areas (bike hangers, parking hubs are higher in cost and require locations to be adapted, suitable support for these needs to be continued particularly near hubs of universities, visitor attractions and transport hubs.

Central London streets shared by pedestrians and cyclists need to be designed to encourage thoughtful use (consideration of suitable education & comms to encourage considerate use and understanding there are many types of users). There are still many conflict points where the paths of cyclists cross both pedestrian and motor vehicles.

T6: Parking (offices, retail, hotel & leisure)

With suitable investment in safe and efficient public transport system parking associated with offices should be reduced. Providing suitable infrastructure to encourage the change to EV's and alternatives for freight, servicing and taxis.

**T7: Freight & Deliveries:** Efficient and sustainable freight needs to be planned in the short and long term to ensure businesses can thrive. Investment in coordination for different needs and business sectors to be aligned with investment to reduce congestion and encourage deliveries and servicing away from peak hours with consideration of noise and peak hour use.

Through business engagement, investment in consolidation hubs and collaborative working has been identified as options for further consideration and more detailed review. The Northbank BID works with neighbouring business groups, other London BID's and councils to bring together a collaborative approach and a strategy.

## **Chapter 11: Funding the London Plan.**

The London Plan identifies significant funding gap to deliver ambitious plans, so an appropriate funding mechanism needs to be developed which supports business growth, sustainability and infrastructure needs. In addition to this, we welcome improved economic assessment for the benefits green infrastructure bring. Cultural infrastructure, including affordable creative workspace