



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

Via email: londonplan@london.gov.uk

02 March 2018

Dear Mayor Khan and London Plan Team,

Written Representation in relation to the Draft New London Plan (December 2017)

We Are Waterloo wishes to make formal representations to the Draft New London Plan (December 2017) which is currently undergoing statutory consultation until 02/03/2018.

We Are Waterloo is an organisation focused on promoting Waterloo as an area that attracts visitors, whilst maintain its individuality and unique character. We Are Waterloo has established a Business Improvement District (BID), which generates revenue via a levy paid by all businesses in the area. Please refer to Appendix A for a map of the We Are Waterloo BID area. This investment is subsequently 100% ring-fenced for projects that benefit local businesses and improve trading conditions. We Are Waterloo is focused on creating a safer and more pleasant trading environment for businesses.

These representations are made in respect of We Are Waterloo's interests, being the BID Area, and their aims and objectives for this area. This letter provides support for some policies of the Draft New London Plan 2017, objects to other elements of the New London Plan, and makes recommendations for the document's improvement. These issues discussed herein include:

- The Central Activities Zone, Opportunity Areas and Town Centres;
- Protection of Existing Office Developments;
- Neighbourhood Planning;
- Culture and Creative Industry; and
- Outdoor Markets.

WeAreWaterloo

Build Studios
203 Westminster Bridge Road
London
SE1 7FR

T : 020 7620 1201
E : info@wearewaterloo.co.uk
W : www.wearewaterloo.co.uk
T : [@wearewaterlooUK](https://twitter.com/wearewaterlooUK)



Central Activities Zone, Opportunity Areas and Town Centres

It is acknowledged that the We Are Waterloo BID area is designated as an Opportunity Area under Figure 2.16 of the Draft New London Plan 2017.

We Are Waterloo is supportive of *Policy SD1 – Opportunity Areas* of the Draft New London Plan, insofar as it recognises opportunity areas as the most important locations in London given their potential to accommodate “*new housing, commercial development and infrastructure*”. Notwithstanding this, concern is raised that whilst some of the Opportunity Areas outside of Central London (including Kingston, Wimbledon etc) have been given specific direction, those located within Central London, such as the Waterloo Opportunity Area, are not discussed individually or at length in the Draft.

With respect to Central London Opportunity Areas, Paragraph 2.1.65 of the Draft New London Plan simply states “*It contains a large number of OAs, many of which are maturing or underway and benefiting from successful development schemes that will be completed over the next few years.*”

This statement is generalised, and does not account for the unique characteristics of the various Opportunity Areas within Central London. It is considered that the Opportunity Areas located within Central London, including Waterloo, have differing functions and distinctive characters, and therefore it is recommended that they each be discussed and given more direction individually within the Draft London Plan.

In addition to being an Opportunity Area, the Waterloo BID Area is within the Draft New London Plan’s Central Activities Zone (CAZ). The CAZ is recognised as being London’s vibrant centre and one of the world’s most attractive and competitive business locations.

We Are Waterloo supports *Policy SD4 – Central Activities Zone*, of the Draft New London Plan, and in particular, the acknowledgement of the significance of existing office uses, the preservation of environmental and heritage values, and the promotion and enhancement of cultural, arts, entertainment and night-time economy activities within the CAZ. All of these matters are important to successful operation of the We Are Waterloo BID Area, and it is positive to see that the Draft New London Plan recognises, promotes and seeks to preserve them.

We Are Waterloo would like to voice concerns about how the Draft New London Plan considers Town Centres within the CAZ. In particular it is considered that there is a failure to recognise Town Centres within the CAZ, as illustrated by Figure 2.17 – Town Centre Network, which supports Policy SD7, apart from the two ‘international centres’. We further note that the Draft New London Plan could provide more detailed guidance for the development of Town Centres, beyond the focus on retail frontages.

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Office to Residential Conversion and Article 4 Directions

When considering policy relating to the CAZ, *Policy SD5 – Offices, other Strategic Functions and Residential Developments* is supported, and in particular the Draft New London Plan's position that new residential development should compromise the strategic function of the CAZ as a competitive business location. In particular, We Are Waterloo is pleased to see the Draft New London Plan's commitment to commercial development, through the statement *"The Mayor will work with boroughs and support them to introduce Article 4 Directions to remove office to residential permitted development rights across the whole of the CAZ"*.

We Are Waterloo acknowledges that as part of Policy SD5, the Draft New London Plan identifies 'Land Use Swaps' and 'Credits' as means to support local balances between CAZ strategic functions and housing. Whilst it is considered that Land Use Swaps can be successful, as long as the use is re-provided for in the immediate neighbourhood, we have concerns about credits as a meaningful solution to this issue where there is no cap on the period by which local authorities agree a plan for their defrayal.

Noting this, it is requested that the Draft New London Plan provide some specific guidance regarding Land Use Swaps, requiring that the use be re-provided in the immediate neighbourhood. Additionally it is strongly recommended that credits be timed, so as to ensure they can be used successfully to the benefit of the local area.

Further to this discussion of Policy SD5 above, We Are Waterloo would also like to voice support for *Policy E1 – Offices* insofar as this policy encourage the protection of existing, viable office and retail uses, through targeted Article 4 Directions for removing Permitted Development Rights where appropriate.

Whilst We Are Waterloo appreciates the need to provide housing across London, Waterloo's function as a business hub is emphasised, and protection of existing office development is mandatory to ensure it remains a viable business location.

Neighbourhood Planning

We Are Waterloo believes that the Draft New London Plan gives little to no recognition to neighbourhood planning as an established and statutory part of London's planning system. As such, it is considered that the Draft New London Plan has missed a major opportunity to highlight the role of neighbourhood planning, and promote neighbourhood planning as route to achieving desired outcomes for smaller areas, and managing development at a microscale.

As the first London Plan to be prepared since the three tier development plan system was adopted in the capital, it is considered the Draft New London Plan presents a significant opportunity to harness

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the role of neighbourhood planning to support and deliver on its strategic objectives. It is concerning to note that the Draft New London Plan remains almost completely silent on neighbourhood planning. Apart from two brief statements in 'Introducing the Plan' (Paragraph 0.0.9) and Chapter 1 'Planning London's Future' (Paragraph 1.1.5), and the inclusion of neighbourhood plans in the definition of 'Development Plan', the Draft New London Plan says very little to support or promote the important role of neighbourhood planning in the statutory planning system.

It is considered that the introductory chapter of the Draft New London Plan must be re-drafted to more accurately identify and reflect the statutory role of Neighbourhood Planning, as identified under the National Planning Policy Framework 2012 and the Neighbourhood Planning Regulations 2012.

Furthermore, it is considered that there is an opportunity to highlight the role Neighbourhood Planning can play under specific policies of the Draft New London Plan. In particular, policies relating to Design, Housing, Social Infrastructure, Economy and Heritage and Culture could all benefit from further emphasis being placed on how neighbourhood planning can help deliver better local outcomes for London.

Without including a stronger emphasis on Neighbourhood Planning, We Are Waterloo considers that the Draft New London Plan may be legally '**not sound**' due to its lack of acknowledgment of National Planning Policy Framework 2012 requirements placed on local planning authorities in relation to neighbourhood planning

Culture and Creative Industry

It is acknowledged that the Draft New London Plan provides a much stronger policy position in terms of protecting and growing the City's culture and creative industries, and this approach is commended.

We Are Waterloo recognises that Policy HC5 of the Draft New London Plan seeks to support the culture and creative industries in London through the protection and enhancement of existing cultural venues and the promotion of new cultural facilities and creative industries. The policy identifies strategic clusters of cultural attractions, and defines these localities as 'Cultural Quarters'. The policy also promotes the creation of Creative Enterprise Zones to support and enhance London's cultural offer.

We Are Waterloo is in support of this proactive approach to arts and culture, and is supportive of Waterloo's inclusion within an area identified for Arts, Culture and Entertainment under figure 2.16 of the Draft New London Plan.

London's competitive land market can make it difficult for creative spaces and cultural venues to grow, or even remain, and therefore it is promising to see the Draft New London Plan offer policy support for these uses, which are socially and culturally invaluable.

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We Are Waterloo also wishes to voice support for Policy HC6, which aims to support the night-time economy which encourages Boroughs to develop a vision for the night-time economy that promotes its growth and diversification. BIDs are an essential part of this conversation.

Protection of Outdoor Markets

We Are Waterloo seeks to protect outdoor street markets, which are considered to make a positive social, cultural and economic contribution to the Waterloo BID Area. *Policy E9 – Retail, Markets and Hot Food Takeaways* of the Draft New London Plan 2017 is acknowledged and is considered to make some progress in terms of promoting Outdoor Markets.

In particular, point 7 of Policy E9, which states “*In Development Plans, boroughs should ... (7) support the range of London’s markets, including street markets, covered markets, specialist and farmers’ markets, complementing other measures to improve their management, enhance their offer and contribute to the vitality of town centres and the Central Activities Zone*” is recognised as being a positive outcome.

However, it is considered that the Draft New London Plan could offer a much stronger policy position in terms of protecting and promoting street markets in the face of considerable pressures for permanent built structures.

As such, it is recommended that an additional clause could be added to Point 7 of Policy E9 of the Draft New London Plan, providing advice that the viability of street markets should be given greater weight in the assessment and determination of planning applications. In particular, we believe that this policy needs to emphasise that the assessment of planning applications needs to carefully consider the potential impacts of new development on the ongoing operation of street markets, both during and after the construction.

It is hoped that the Draft New London Plan be amended to further recognise the positive social, cultural and economic contribution street markets can make, and thus offer them a higher level of protection from new development.

Conclusion

We Are Waterloo is of the opinion that in general the Draft New London Plan (2017) represents an improvement on the current London Plan. Despite this, We Are Waterloo considers that Draft New London Plan has missed an opportunity to identify and promote the role of neighbourhood planning, and that the document will need to be amended to rectify this issue before it can be adopted.

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Furthermore, we believe there are some matters that should be re-addressed before the Plan is adopted. In particular, We Are Waterloo would like to see more detailed direction given to Central London Opportunity Areas, and more specific policy provided to afford outdoor street markets better protection.

We trust that these comments will be useful in the ongoing development of the Draft New London Plan (2017).

Yours sincerely,

Ben Stephenson
Chief Executive
We Are Waterloo BID

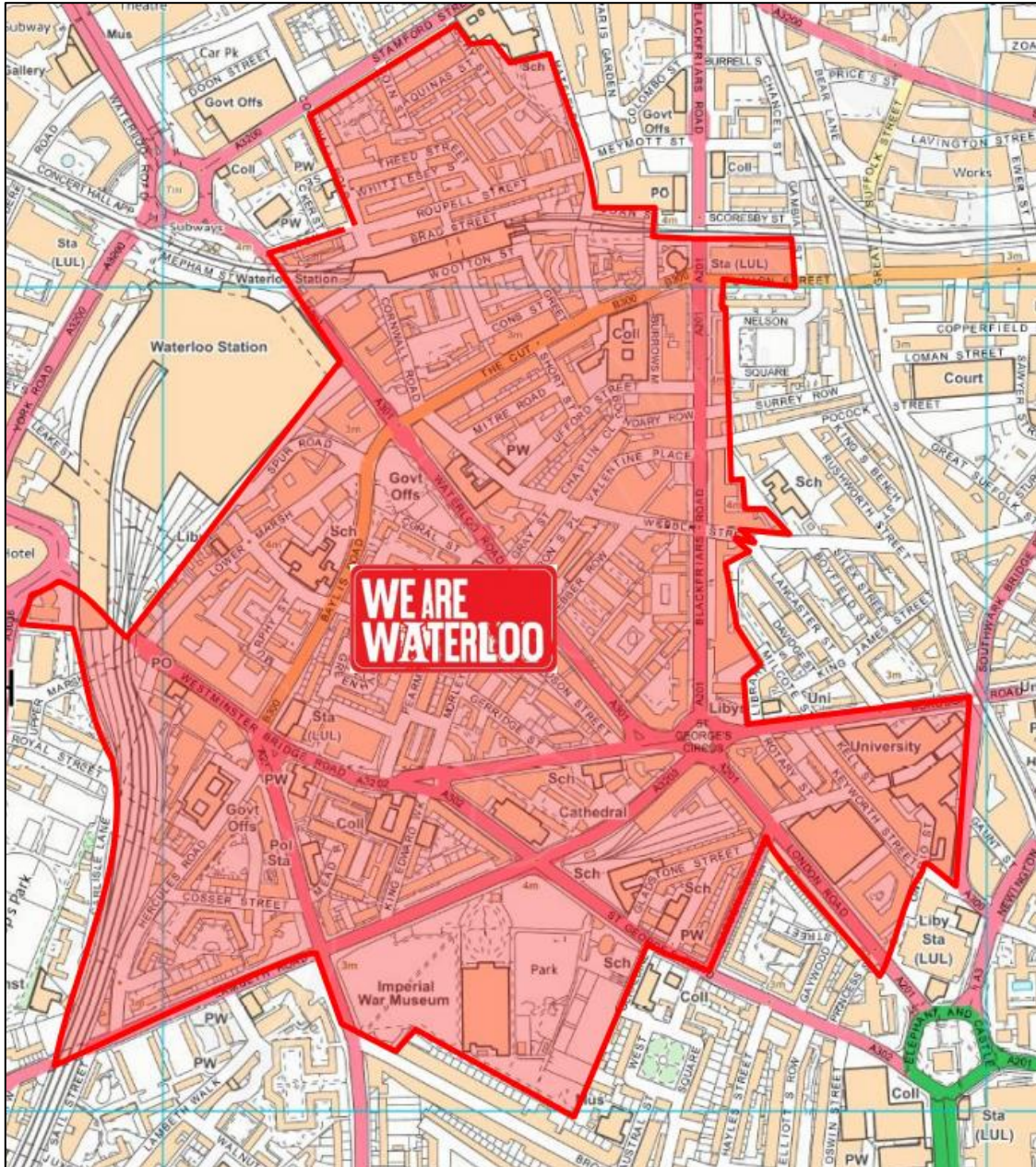
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APPENDIX A – Waterloo BID Area



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WeAreWaterloo Business Improvement District comments

Page: [Draft New London Plan](#)

Section: [N/A](#)

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As the first London Plan to be prepared since the three tier development plan system was adopted in the capital, it is considered the Draft New London Plan presents a significant opportunity to harness the role of neighbourhood planning to support and deliver on its strategic objectives. It is concerning to note that the Draft New London Plan remains almost completely silent on neighbourhood planning. Apart from two brief statements in 'Introducing the Plan' (Paragraph 0.0.9) and Chapter 1 'Planning London's Future' (Paragraph 1.1.5), and the inclusion of neighbourhood plans in the definition of 'Development Plan', the Draft New London Plan says very little to support or promote the important role of neighbourhood planning in the statutory planning system.

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Page: [Introducing the Plan](#)

Section: [0.0.9](#)

Is there to be an explanation here of the Mayor's definition of General Conformity, and what is meant by strategic policies?

Page: [Policy SD1 Opportunity Areas](#)

Section: [N/A](#)

We Are Waterloo is supportive of Policy SD1 – Opportunity Areas of the Draft New London Plan, insofar as it recognises opportunity areas as the most important locations in London given their potential to accommodate “new housing, commercial development and infrastructure”. Notwithstanding this, concern is raised that whilst some of the Opportunity Areas outside of Central London (including Kingston, Wimbledon etc) have been given specific direction, those located within Central London, such as the Waterloo Opportunity Area, are not discussed individually or at length in the Draft.

Page: [Policy SD1 Opportunity Areas](#)

Section: [2.1.65](#)

With respect to Central London Opportunity Areas, Paragraph 2.1.65 of the Draft New London Plan simply states “It contains a large number of OAs, many of which are maturing or underway and benefiting from successful development schemes that will be completed over the next few years.”

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Page: [Policy SD4 The Central Activities Zone \(CAZ\)](#)

Section: [N/A](#)

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Page: [Policy SD4 The Central Activities Zone \(CAZ\)](#)

Section: [Figure 2.17](#)

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Page: [Policy SD5 Offices, other strategic functions and residential development in the CAZ](#)

Section: [N/A](#)

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Page: [Policy E1 Offices](#)

Section: [N/A](#)

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Page: [Policy HC5 Supporting London's culture and creative industries](#)

Section: [N/A](#)

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London's competitive land market can make it difficult for creative spaces and cultural venues to grow, or even remain, and therefore it is promising to see the Draft New London Plan offer policy support for these uses, which are socially and culturally invaluable.

Page: [Policy HC6 Supporting the night-time economy](#)

Section: [N/A](#)

We Are Waterloo also wishes to voice support for Policy HC6, which aims to support the night-time economy which encourages Boroughs to develop a vision for the night-time economy that promotes its growth and diversification. BIDs are an essential part of this conversation.

Page: [Multi-policy response](#)

Section: N/A

Full comments - see attachment