


# Team London Bridge

## Response to the Draft New Southwark Plan

### Linking to the London Bridge Plan

February 2016



### PRINCIPLES, POLICIES AND PROJECTS

PRINCIPLES	ECONOMY	PLACESHAPING	PARTNERSHIPS
<b>IDENTITY</b> Reveal the London Bridge story	<b>ECONOMY</b> Ensure strength and health of the local economy by developing the local business base	<b>PLACESHAPING</b> Create a world-class physical environment that is inspiring and attractive	<b>PARTNERSHIPS</b> Engage and empower London Bridge partners
<b>POLICIES</b> ESTABLISH LONDON BRIDGE AS THE HEART OF LONDON'S CULTURE AND COMMERCE PROMOTE QUALITY AND INNOVATION IN LONDON BRIDGE'S BEST ENVIRONMENT IMPROVE BUYING AND DISCOVERY ACROSS THE CHARACTER AREAS	INCREASE OFFICE SPACE TO ESTABLISH A COMMERCIAL FOCUS IN LONDON BRIDGE DRIVE SUBSTANTIAL INCREASE IN RETAIL, RESTAURANT AND LEISURE OFFERS IN LONDON BRIDGE IMPROVE BUYING AND DISCOVERY ACROSS THE CHARACTER AREAS	PRIORITISE CLEAN TRAVEL BY PROVIDING CONVENIENT, SAFE AND ATTRACTIVE WALKING AND CYCLING ROUTES ESTABLISH A NETWORK OF PARKS, GREEN SPACES AND GARDENS LIVE LONDON BRIDGE'S DISTINCTIVE CHARACTER VIA SUSTAINABLE SPACES AND ENRICHING USES CREATE INCLUSIVE, WELCOMING PUBLIC PLACES THAT PUT PEOPLE, THEIR HEALTH AND THE ENVIRONMENT FIRST	INTEGRATE STAKEHOLDER PLANNING THROUGH PARTNERSHIPS THAT INCREASE COSTS AND IMPROVE THE ENVIRONMENT EMPHASISE THE GROWTH OF INNOVATION, EDUCATION AND TECHNOLOGY SUPPORT AND CONNECT SURROUNDING COMMUNITIES
<b>PROJECTS</b> Culture Canals Eldon and Public Square Navigation	Building Retail Developments and Parks Jobs Hub	The Low Line St. Thomas Street Buildings High Street London Bridge Thames Explains The Green Grid	Sustainable Homes London Bridge Science, Eds and Mobs The Interchange

### LONDON BRIDGE PLAN DEVELOPMENT

An interactive series of consultations were utilised to help engage public and private sector stakeholders in the development of this plan.

- London Bridge Visioning Session 200 Stakeholders
- Walking Workshops Across London Bridge 60 Stakeholders
- Policies and Projects Workshop 50 Stakeholders
- Londonbridge.co.uk 400+ comments
- More than 50 individual stakeholder meetings and interviews

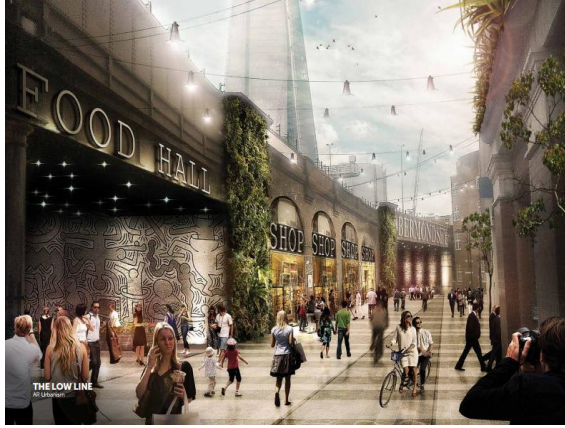
Key themes and words from the research for the London Bridge Plan

- SEATING
- GREENING
- PARKS
- ARTS & CULTURE
- WIDE PAVEMENTS
- PEDESTRIANISATION
- LIGHTING
- NIGHTLIFE
- POP-UPS

#### THE LONDON BRIDGE TIMELINE

Several years of detailed planning and consultation have all provided content and research critical to formulating the plan strategy.

- 2002: CMA issues the RfP for the London Bridge
- 2005: Stakeholders set for a RfP to be established by London Bridge
- 2008: Stakeholders set for a RfP to be established by London Bridge
- 2009: Stakeholders set for a RfP to be established by London Bridge
- 2010: Stakeholders set for a RfP to be established by London Bridge
- 2011: Stakeholders set for a RfP to be established by London Bridge
- 2012: Stakeholders set for a RfP to be established by London Bridge
- 2013: Stakeholders set for a RfP to be established by London Bridge
- 2014: Stakeholders set for a RfP to be established by London Bridge
- 2015: Stakeholders set for a RfP to be established by London Bridge
- 2016: Stakeholders set for a RfP to be established by London Bridge



THE LOW LINE AT LONDON

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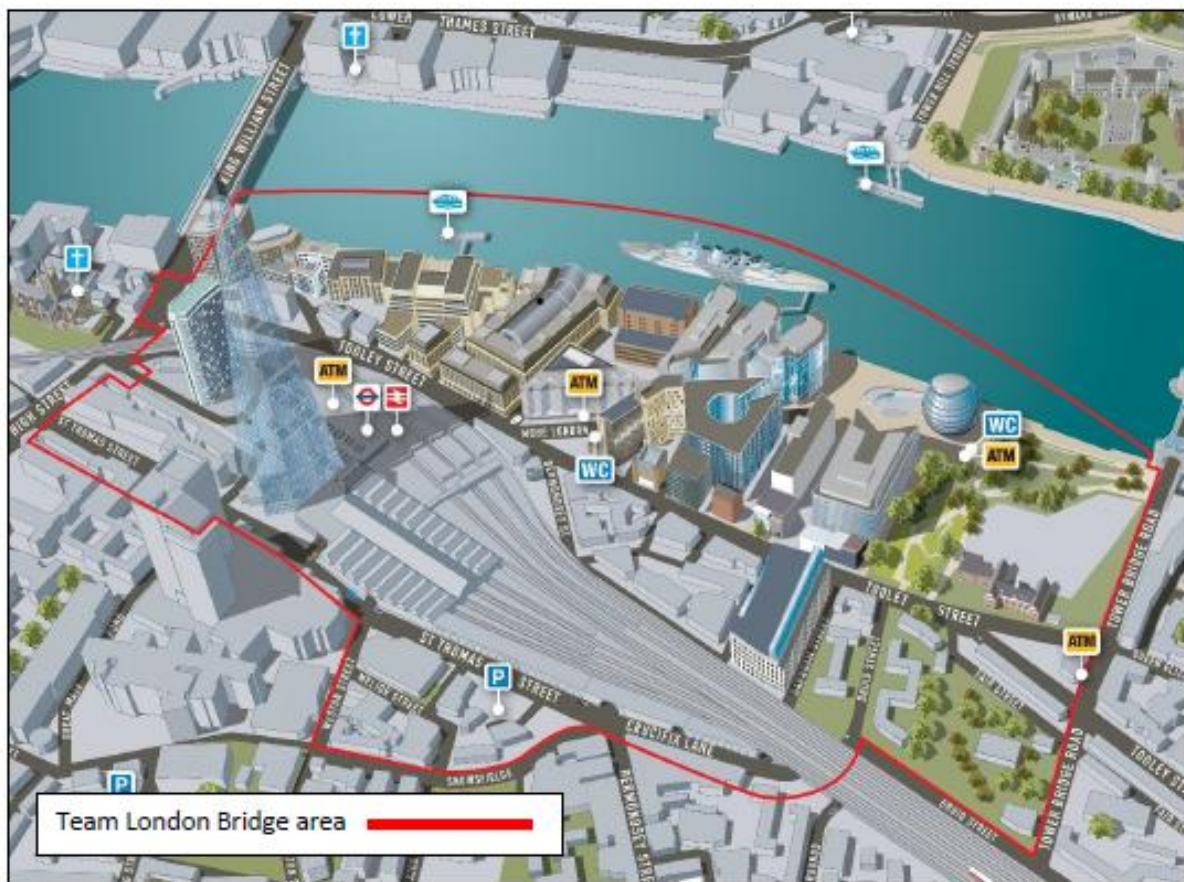
1. London Bridge Plan
2. Proposed “Area Vision for London Bridge”
3. Councillor Mark Williams letter in the London Bridge Plan
4. Team London Bridge comments on the CAZ SPD Sept 2015

## Introduction

### Team London Bridge

The comments made by Team London Bridge (TLB) on the Southwark Draft New Southwark Plan reflect the purpose and aims of TLB. The London Bridge Plan sets out our strategic vision for the London Bridge area. Our aims and projects have developed out of local public consultation with over 300 businesses and 400 individual comments, as well as taking into account local and strategic planning and economic strategies. A second BID extension to 2021 was won in 2015.

### Area map



## London Bridge Plan

**A FORMIDABLE & DIVERSIFIED ECONOMY**

**A CLEAR, RECOGNISABLE IDENTITY**

**A WELL CONNECTED, ENGAGING & CONTEXT SENSITIVE PLACE**

**COLLABORATION, INTEGRATION & STRONG PARTNERSHIPS**

# A GLOBALLY SIGNIFICANT, HISTORIC AND VIBRANT PLACE OF MODERN COMMERCE, ENTERPRISE AND CREATIVITY

## THE VISION FOR LONDON BRIDGE

**This is the London Bridge Plan**  
 This plan provides concrete steps to embolden London Bridge to achieve its potential.

The London Bridge Plan will be the guide by which policy and investment decisions are made in London Bridge, by both the public and the private sector. It sets out policy for the area, and identifies strategic areas for investment. It will bolster our identity, strengthen our economy, establish a defining sense of place and create vital partnerships.

The London Bridge Plan marks a new way of working together. In creating it, we have engaged the diverse stakeholders who we represent, and united them with the public sector. It is our responsibility, in working together, to implement it.

**The following pages set forth our action steps and our collective responsibilities in taking London Bridge forward.**

This London Bridge Plan is produced by Team London Bridge in partnership with Southwark Council.



**THIS PLAN MUST PREPARE LONDON BRIDGE FOR A LARGE INCREASE IN USERS**

**THIS PLAN WILL CHANGE THE WAY LOCALS, COMMUTERS & VISITORS ENGAGE WITH LONDON BRIDGE**

**THIS PLAN WILL STRENGTHEN THE LOCAL ECONOMY, GROW JOBS & BUILD PARTNERSHIPS**

## A LONDON BRIDGE PLAN

### WHY IS THIS PLAN CRITICAL NOW?

London Bridge is experiencing rapid development and growth in changing times for London. Ensuring the area retains a healthy mix of uses and that development is well-connected and interesting means acting now.

**Demand will increase**  
 Among the most impactful changes will be the London Bridge Station redevelopment, which will result in an increase of over 60% in Thameslink rail capacity and new entrances/exits on both Tooley Street and St. Thomas Street. Add to that a 50% increase in bicycle use every five years and a 50% increase in the number of pedestrians in London Bridge in the next five years. Additionally, with a focus on river transport growing throughout London, usage is expected to increase substantially by 2020. This plan must prepare London Bridge to accommodate significant new numbers of users, and in use patterns that are different than before.

**Economic realities are changing**  
 The high street struggles of recent years are creating challenges for traditional retail, but opening up doors for independent, unique,

creative and diversified local economies. London Bridge can set itself apart as a retail destination but must do so thoughtfully and intentionally. Provision of wider footways, more green spaces and convenient, safe and attractive walking and cycling routes will be all important considering the high volumes of journeys to work on foot and by bike in the area. Likewise this will make an attractive public realm for retailers and consumers alike, helping to drive trade and shopping visits.

**Competition is growing**  
 Districts immediately surrounding London Bridge are on the cusp of significant public and private sector investment in both new commercial and residential space. To remain competitive, London Bridge must distinctively position itself against these rising areas and create a clear case for investment here.

**Unprecedented development**  
 As the world rebounds from economic recession, development is happening fast. Money comes in, and buildings go up. Without any context, these developments will fundamentally change the character of London Bridge. Providing a clear sense of direction will be critical to ensure there is integration and appropriate design.

**Significant new residential growth**  
 Residential growth creates a more demanding 24/7 environment. It also brings new opportunities to expand the offer of London Bridge beyond primarily daytime uses. Managing a mixed-use district, however, requires nuanced development and policy. Developments such as One Tower Bridge, The Quill on Weston Street and Fielden House will usher in a new era for London Bridge, but it must be balanced.

## Consultation and Development

# LONDON BRIDGE PLAN DEVELOPMENT

An interactive series of consultations were utilised to help engage public and private sector stakeholders in the development of this plan.

- London Bridge Visioning Session  
200 Stakeholders
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60 Stakeholders
- Policies and Projects Workshop  
50 Stakeholders
- InLondonbridge.co.uk  
400+ comments
- More than 50 individual stakeholder meetings and interviews



Key themes and words from the research for the London Bridge Plan



## THE LONDON BRIDGE TIMELINE

Several years of detailed planning and consultation have all provided context and research critical to formulating this plan strategy.



# STATUTORY PARTNERS

## TEAM LONDON BRIDGE

Major development and change continue to forge ahead in London Bridge and those invested in this area are participating in creating a bold vision for its future through the London Bridge Plan.

London Bridge is a thriving commercial hub and destination. More than 50,000 workers access the 450-plus businesses located here, while London Bridge Station accommodates in excess of 200,000 travellers a day. Some 30,000 residents within one mile call London Bridge home, and we have over 5 million visitors a year taking in the sights.

This plan establishes a strategic approach to ensuring London Bridge continues to develop in a way that is both complementary of, and sensitive to, the place that it is today. It is critical that the identity of London Bridge – the place in which our stakeholders trade and live, and visitors spend their precious free time – be carefully curated and managed to ensure that as growth continues, London Bridge smartly responds.

The London Bridge Plan focuses on a big picture vision for the district, one that will influence and inform future policy and decision-making from both the public and private sectors. We realise that all the projects put forward in this plan will be challenging with a number of hurdles along the way. However, following ten years of service delivery in the area, and significant engagement with stakeholders to develop this plan – including developers, businesses, residents, visitors and private and statutory organisations – we are confident that the objectives have been identified and a clearly articulated vision is now in place.

The development of the London Bridge Plan is only the first stage in realising the considerable but totally reasonable requests and aspirations of the local community. We are working with Southwark Council to ensure the projects are integrated into the New Southwark Plan.

James Dinwiddie  
Chair, Team London Bridge

TeamLondonBridge  
improving our district



## SOUTHWARK COUNCIL

London Bridge is part of Central London, and is a globally significant, historic and vibrant place of modern commerce, enterprise and connectivity. The area benefits from unique, cultural and historic attractions such as Borough Market, the Thames riverfront and Bermondsey Street, all of which must be protected and where possible enhanced.

Alongside these important assets, ongoing transformation of the area has delivered world-class developments that have helped raise the profile of Southwark and London as a whole. Completion of the new London Bridge station will greatly improve national and local transport links and contribute to an enhanced retail offer and public realm, helping to support continued growth of office, retail, cultural, civic and health uses in the area.

Given this context, we welcome the publication of this London Bridge Plan for Team London Bridge's Business Improvement District (BID). The plan sets out a strategic approach to conserving and enhancing the unique identity of the area in a highly accessible format. We have appreciated Team London Bridge's proactive approach to developing this plan and inviting our input; and acknowledge the extensive engagement work, with multiple stakeholders, that has informed the aspirations for the area embodied in this plan.

The key objectives and themes of the plan are positive ones that we share – creating better walking and cycling connections; protecting, enhancing and better revealing the character and history of the area; boosting employment through the provision of office space (appropriate in this central London location close to the City); improving the retail, restaurant and leisure offer; making the most of opportunities in the railway viaduct arches, as part of improved pedestrian-friendly streetscapes; and better integrating and connecting Guy's and King's campuses into the wider area.

Indeed many of these objectives are reflected in the emerging policies and proposals in the council's New Southwark Plan. For example, the current version includes policies addressing cycling and walking, supporting the 'Low Line' walking route, securing high quality design of places and buildings, protecting the historic environment and natural heritage, and promoting business development including small business units and development of the railway arches.

Given these strong overlaps we believe that the London Bridge Plan is broadly aligned with, and will assist the delivery of, the council's planning policies for the BID area. We will use this plan to prepare the area vision for London Bridge; this will be formally consulted upon along with other area visions as part of the New Southwark Plan. We look forward to continuing to work with Team London Bridge to coordinate our ongoing efforts to improve the area for Southwark's residents, workers and visitors.

Cllr Mark Williams  
Cabinet Member for Regeneration  
and New Homes



# London Bridge Plan priorities

Please see Proposed “Area Vision for London Bridge 2016 - 2031” (Appendix 2)

## IDENTITY

### REVEAL THE LONDON BRIDGE STORY

The London Bridge identity is complex and multi-faceted. There is a story to be told. There is a special environment to be discovered. The history and elements that are unique to London Bridge will be revealed through programming, public art, policies and placemaking, bringing to life a unique storyline that invites locals and visitors to discover and explore London Bridge.

### POLICIES

**ESTABLISH LONDON BRIDGE AT THE HEART OF LONDON'S CULTURE AND COMMERCE**

•

**PROMOTE QUALITY AND INNOVATION IN LONDON BRIDGE'S BUILT ENVIRONMENT**

•

**IMPROVE WAYFINDING AND ENCOURAGE DISCOVERY ACROSS THE CHARACTER AREAS**

### PROJECTS

**CULTURE CATALYSED**  
Creating linkages between cultural assets through partnerships, programming and public realm  
See page 11

**ENLIVENED PUBLIC SPACES**  
Activations and installations to reflect the London Bridge identity, creating physical enhancements, driving economic vitality and inviting interaction  
See page 12

**NAVIGATION**  
Using technology, lighting, art and traditional signage to direct pedestrians and cyclists through safe and accessible public spaces  
See page 13

### THE FACTS & FIGURES

**5 million** visitors per year partake in the unique cultural attractions the area offers.

The area has been at the heart of London's historic and cultural development since before Roman times.

The top landmarks most identified with London Bridge are London Bridge Station, Borough Market, The Shard and London Bridge itself.

Lesser known are the many smaller cultural destinations, which include The Greenwood Theatre, The Old Operating Theatre & Museum, The Unicorn Theatre, Fashion & Textile Museum and the White Cube.

## ECONOMY

### ENSURE STRENGTH AND DEPTH OF THE LOCAL ECONOMY BY DEVELOPING THE MIX OF BUSINESSES

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.

### RETAIL SPEND IN LONDON BRIDGE

**Card spend:**  
Low High

- Highest retail spend is around the Station, The Shard, and More London.
- Tower Bridge Road is relatively weaker
- Great opportunity exists around Hay's Galleria, One Tower Bridge, and St Thomas Street

### POLICIES

**INCREASE OFFICE SPACE TO ESTABLISH A COMMERCIAL STRONGHOLD IN LONDON BRIDGE**

•

**DRIVE SUBSTANTIAL INCREASE IN RETAIL, RESTAURANT AND LEISURE OFFERS IN LONDON BRIDGE**

•

**CREATE JOBS FOR LOCAL WORKERS IN ORDER TO EXPAND THE LOCAL ECONOMY**

### PROJECTS

**REDEFINING RETAIL**  
Repositioning London Bridge in the marketplace as an alternative boutique shopping destination  
See page 15

**WORKSPACES AND PLACES**  
Ensuring London Bridge remains an economically healthy commercial area  
See page 16

**JOBS HUB**  
Catalyse the development of local jobs for local people, improving wealth and adding opportunity  
See page 17

### THE FACTS & FIGURES

London Bridge is a premier global trading centre in the world-class city that is London, hosting the headquarters of several corporate global businesses.

**5 million sq ft**  
London Bridge holds roughly 5 million square feet of office space with extremely low vacancy rates.

**1%**  
In 2015 office vacancy rates were at 1% across the London Bridge and wider South Bank area.

In 2015, London Bridge had just 7% of the retail spend of that in Victoria, a similar area.

Thousands of jobs will be lost annually if commercial property stock is diminished.

# PLACESHAPING

## ENSURE A WORLD-CLASS PHYSICAL ENVIRONMENT THAT IS ENGAGING AND DISTINCTIVE

London Bridge's past and present will mesh together, intertwined in the public realm in a way that is respectful of the heritage of the area, supportive of innovative design and increases public safety. The public realm will prioritise convenient and safe pedestrian routes, with pavements that are widened, tree-lined and well lit. New developments should be free of private car use given the proximity to public transport and cycling will be encouraged with facilities and infrastructure befitting a major transport hub.

100 PLACESHAPING

### POLICIES

**PRIORITISE CLEAN TRAVEL BY PROVIDING CONVENIENT, SAFE AND ATTRACTIVE WALKING AND CYCLING ROUTES**

**ESTABLISH A NETWORK OF PARKS, GREEN SPACES AND GARDENS**

**LINK LONDON BRIDGE'S DISPARATE AREAS VIA SUSTAINABLE THEMES AND ENRICHING USES**

**CREATE INCLUSIVE, WELCOMING PUBLIC PLACES THAT PUT PEOPLE, THEIR HEALTH AND THE ENVIRONMENT FIRST**

### PROJECTS

#### THE LOW LINE

A world-class corridor connecting the historic railway arches and their economic opportunity to the public realm

See page 21

#### ST. THOMAS STREET BOULEVARD

A pedestrian-focused public realm bringing new opportunities for amenities, seating and business

See page 23

#### HIGH STREET LONDON BRIDGE

A permeable integration of the redeveloped London Bridge Station and Tooley Street

See page 25

#### THAMES ESPLANADE

A new Riverwalk will seamlessly link London Bridge's waterfront experience to the rest of London

See page 27

#### THE GREEN GRID

London Bridge will bring its green and open spaces up to world-class standards and link them via a green grid of walking and cycle friendly streets

See page 28

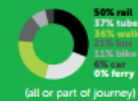
### THE FACTS & FIGURES

**65%** of respondents felt the area needs more and better quality green and open spaces.

**39%** of London Bridge is comprised of buildings, yet the district has managed to retain a human scale and is a walkable place to work and visit.

The area has attracted some of the world's most innovative property owners. Contemporary architects with an interest in the area include Renzo Piano, Norman Foster, Thomas Heatherwick and Zaha Hadid.

#### London Bridge Commuters



**129million** passenger journeys via London Bridge national rail and tube stations combined in 2014.

**4th** busiest rail station in the UK, over 60% increase in Thameslink rail capacity from 2018.

**10:1** Tooley Street rush-hour pedestrian to cars ratio.

**170%** increase of cycling in London since 2001.

# PARTNERSHIPS

## ENGAGE AND INTEGRATE LONDON BRIDGE PARTNERS

A collaborative approach towards responsible business will be established that incorporates tangible, outcome-focused projects, and clear partnerships between people and businesses to develop a sustainable London Bridge. By working together, London Bridge will catalyse local innovation that benefits local organisations, support and promote sustainable community places, and improve access to employment and career growth for local people. The focus will be on community, wellbeing, employability and sustainability.

100 PARTNERSHIPS

### POLICIES

**INTEGRATE STAKEHOLDER PLANNING THROUGH PARTNERSHIPS THAT DECREASE COSTS AND IMPROVE THE ENVIRONMENT**

**EMPHASISE THE GROWTH OF INNOVATION, EDUCATION AND TECHNOLOGY**

**SUPPORT AND CONNECT SURROUNDING COMMUNITIES**

### PROJECTS

#### RESPONSIBLE BUSINESS: LONDON BRIDGE

London Bridge will take a leadership role in supporting partnerships between people and businesses

See page 30

#### SCIENCE, EDS & MEDS

London Bridge will harness the expertise, research and infrastructure of local educational and medical facilities to improve the district

See page 31

#### THE INTERCHANGE

Collaborative physical and virtual spaces will connect local organisations and individuals

See page 32

### THE FACTS & FIGURES

**15%**

Southwark's resident population is estimated to increase by 47,000 people in the next 10 years, way above the London average.

**30%**

of children 16 and under live in deprivation.



Southwark has among the highest rate of childhood obesity in the country.

#### Within London Bridge there are:

- 400+ businesses
- 50,000 employees
- 30,000 residents (within 1 mile)
- 3,000 Southwark based community groups
- Roughly 5,200 undergraduates and 2,200 graduates
- King's College School of Medicine, Guy's Hospital and London Bridge Hospital together employ over 5,000 people

TLB works closely with the Shad Thames Area Management Partnership (STAMP) as well as with neighbouring Bermondsey Street Area Partnership. The three organisations share a number of aims and concerns, and we have discussed our responses on common issues. In particular, we all support the following points:

- The importance of community-led Area Visions for London Bridge, Shad Thames and the Bermondsey Street area and the need to finalise these as an integral part of the New Southwark Plan process.
- The need to update the Conservation Area Appraisals for each of these areas.
- The creation of a list of non-designated assets of value to the community for each area.



## Delivering the New Southwark Plan in London Bridge

### Development sites

Team London Bridge are keen to be involved in ensuring that briefs for any designated development sites are consistent with both our Proposed Area Vision and the detailed comments noted within this report.

### CIL / s106

Team London Bridge are keen to work with Southwark Council to ensure that the strategic projects identified with the London Bridge Plan are included within the Community Infrastructure Levy project list.

### Planning applications

Taking forward the London Bridge Plan, Team London Bridge:

- are keen to work with Southwark Council and developers at the pre-application stage so as to ensure that developers and developments positively build into their projects the vision of the London Bridge community as articulated in the London Bridge Plan;
- will work with Southwark Council and developers to ensure that development proposals and planning applications are communicated to the London Bridge Community in sufficient time and detail so as to allow for a productive and comprehensive consultation process;
- will formally respond to all significant planning applications on the basis of both comments received from our business members and key stakeholders (on the basis of the above noted communication and consultation) and on the published London Bridge Plan; and
- would urge Southwark Council Planning Committee to invite Team London Bridge to articulate this formal response at Planning Committee hearings.

## Detailed response to New Southwark Plan

### Strategic comments

Forward	
Comments	<p>1) The current foreword focuses almost entirely on “housing”. Town planning is about more than this. (See NPPF para 7-9, 17, 156 and 157 NPPF). It is particularly also about sustainable employment and economic growth which provides the opportunity and location focus for residential and community development. NPPF makes this very clear. This should be better reflected in the NSP in its Foreword and its Plan purposes.</p> <p>2) The London Plan formerly requests (Policies 2.10 and 2.11) Borough Local Plans to “develop more detailed policies and proposals for priorities and functions in Central Activity Zone (CAZ) locations”. This is supported by the LBS representations to the Mayor on the Draft CAZ Supplementary Planning Document (CAZ SPG) para 1 and 2 dated 11.12.15 (Appendix 1). The reason the proposed new words say “regeneration areas including London Bridge” is because both the Mayor and LBS aim to locate more homes on Bankside and Borough and more offices/workspace in London Bridge, (see Bankside, Borough + London Bridge LB Southwark SPD, Feb 2010 page 16 – BBLB/2010). The reason there should be more “globally attractive offices, culture and retail” at Bankside, Borough and London Bridge is because there are 3 agreed overlapping London Plan policies to support this, (CAZ, Opportunity Area 21 and the South Bank Strategic Cultural Area). Not to recognise this in the NSP would be contrary to the London Plan and NPPF and out of step with other modern Local Plans that do make reference to key Mayoral designations/policies i.e. Westminster, Lambeth and Camden. London’s projected growth will afford plenty of opportunity to bring forward Southwark’s other regeneration targets and complimentary areas of growth like Canada Water and Elephant &amp; Castle. There is no need in constraining London Bridge which is now ready to grow and has the capacity and investment interest. The Draft plan’s commitment to “500 affordable workspace units” is also worthy of inclusion in the Foreword as a significant land use aim, but should be expanded to include office, retail and workspace – a particular concern of the London Federation of Small Businesses, (“Back the 99% 2015 Manifesto from London’s Small Businesses” – 99.3% of London’s 928,000 private sector businesses, are small).</p> <p>3) The Oct 2014 Options Draft of the NSP included reference to London Bridge as a neighbourhood. In his letter of support for the TLB “London Bridge Plan” (Feb 2016), Mark Williams, the Cabinet Member for Regeneration and Homes, recognises London Bridge as a place that will have an “area vision” in the NSP, (Appendix 2)</p>
Change	<p>a) Insert after the 3<sup>rd</sup> para in the Foreword, a new 4<sup>th</sup> para...” Southwark will seek to grow some 34,000 jobs up until 2036, along with 460,000 sqm of office space. The majority of this space will be delivered in our regeneration areas including London Bridge. The Central Activity Zone (CAZ) in Southwark is important to the future of London and the Borough and it needs to be maintained as a competitive business location. For Bankside, Borough and London Bridge, great weight will be attached to delivering globally attractive offices, culture and retail improvements. Southwark will also seek to provide more affordable offices, retail and workspace across the Borough.”</p> <p>b) Insert in the existing 5<sup>th</sup> para, after the word Borough, the words...” London Bridge,”</p>

Purpose of the Plan	
Comments	<ol style="list-style-type: none"> <li>1) The sections entitled “Purpose of the Plan; Planning Documents and Neighbourhood Planning” should be in one section – neighbourhood planning and supplementary guides are part of the statutory planning system.</li> <li>2) In the same way as the 5<sup>th</sup> para under “Southwark Planning Documents” talks about “updates and amendments” – this would be an appropriate place to declare support for new and innovative planning documents that could become supplementary or even formal planning documents, like the TLB “London Bridge Plan” (LBP). This is particularly so, since the LBS has formerly declared that the LBP...”objectives are reflected in the...New Southwark Plan” and that the London Borough of Southwark (LBS) believes that the LBP has been produced with..” extensive engagement work, with multiple stakeholders...and has been informed by the aspirations for the area”...see Appendix 1.</li> <li>3) “The purpose of the New Southwark Plan is to set out how the neighbourhoods will develop and the policies which will guide new developments”.</li> <li>4) “The New Southwark Plan explains the strategy for the regeneration of Southwark and will contain <u>area visions setting out aspirations for places</u>, strategic policies setting out the Council’s strategy for planning and regeneration”.</li> <li>5) “The area visions are being subject to detailed consultation and are draft ideas which will be updated significantly at this stage”.</li> <li>6) Where does it set out how neighbourhood will develop? London Bridge Plan.</li> <li>7) “It will also contains site allocations with specific requirements for the land uses and densities for development of those sites”. This surely requires area visions.</li> </ol>
Change	<ol style="list-style-type: none"> <li>a) Insert in para 5 under the heading “Southwark Planning Documents”, after the word “Castle”: “ Business and community planning documents based on strong local consultation and the principles of the London Plan and Southwark Planning policies - like the non - statutory “ London Bridge Plan - February 2016” produced by TLB BID - may also be considered for “supplementary guidance designation” after the NSP is finalised. Such documents have contributed to the development of NSP and compliment and refine its delivery - as would approved “Neighbourhood Plans” which are discussed below.”</li> </ol>

## Strategic policies

Strategic Policies - Introduction	
Comments	<p>1) It should be noted that neither the Strategic nor DM Policies in this second version of NSP have the advantage of being able to be read with updated versions of “area visions” or a “Borough vision” – this is disappointing since planning is all about place. There is also no “spatial portrait” of Southwark; no proper summary of all key issues (housing is the exception) and no updated spatial strategy or key diagram that looks to the future as all new Local Plans in London are providing. All of these would have helped consultees understand the purpose of the proposed DM policies and overall aims Southwark is proposing. Are there more comments to be viewed from the submission of the consultation stage?</p> <p>2) There will now need to be a consultation on the “vision (s)” and substantive DM policies may also need be revisited once the draft is revealed by LBS. Drafts of “area visions” were in the 2014 Options Draft, but no Borough Vision/spatial strategy or key diagram. NSP should consider looking at the contents of the Lewisham, Lambeth; Westminster and Camden Local Plan formats, (neighbours) to see if a standard format can be provided which would make it easier for residents and businesses to operate and understand planning policies across artificial Borough boundaries.</p> <p>3) It should be noted that the current NSP and the LBS web site says that area visions are available in an updated form for viewing – but to date (17-1-16) cannot be found on the LBS web site.</p>
Change	<p>a) <b>Change:</b> In first para of Introduction – replace “to work with local people” with “<b>work with local people, residents and businesses..</b>”</p> <p>b) <b>Insert:</b> the proposed and attached “<b>London Bridge Vision</b>” set out at <b>Appendix 3 - in to the NSP section under Strategic Policies, before Strategic Policy 1.</b> If this position does not suit LBS, please ensure the attached and proposed London Bridge Vision (Appendix 3) is inserted in a preferred location along with other NSP “Area Visions”. <b>The proposed London Bridge Vision should not be excluded from the NSP.</b> It could also be included in an enlarged “Revitalised Neighbourhoods” section which currently is about “place and design” – or in a new section on “Spatial Portrait and Future Strategy” which should also include a Key Diagram – these are absent from the Preferred Option NSP.</p> <p>c) Insert in the existing 5<sup>th</sup> para, after the word Borough, the words...” London Bridge,”</p> <p>d) “Southwark Council has an ambitious strategy to work with local people to see their values reflected in the New Southwark Plan to improve neighbourhoods and create new opportunities for the future”. How does this play out?</p>

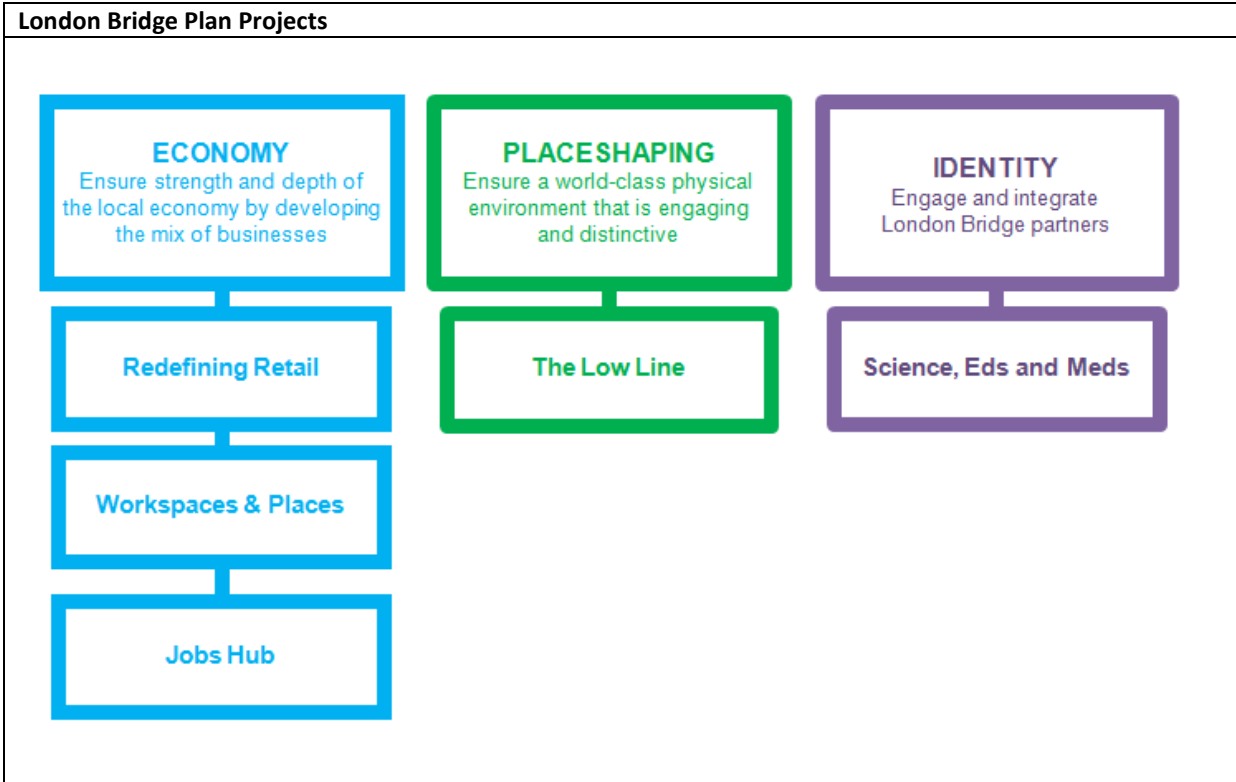
SP1	Quality Affordable Homes
Comments	<p>1) Need to balance with commercial growth in regeneration areas.</p> <p>2) Comment: In the Options version of NSP (2014) Southwark said it <u>would not be possible to build 2.736 homes p.a.</u> without it meaning “higher densities, lower standards and release of protected land” – and proposed 2000. The Preferred version (Oct. 2015) accepts this new high figure without comment on what was said in 2014. Because of the clear Council concern over “quality and capacity”, TLB recommends good and effective scrutiny in key areas of the proposed plan’s DM policies – notably design; heritage; infrastructure; public realm and transport; culture and community use. In addition TLB recommends the use of more “integrated urban management (IUM) plans and maintenance” particularly for complex and significantly developed sites/areas to ensure good standards of delivery. IUM means adding “area wide urban design; way finding and digital connections; place and green sensitive public realm improvements along with space events and activities” to more traditional transport and streetscape improvements - to increase the quality and actual use of places and the space.</p> <p>3) As we build more densely to respond to population and household growth – better and more integrated use of all urban space will be required and space must be increasingly owned and respected by users, a critical part of IUM.</p>
Change	<p>a) <b>Replace the sentence...</b>“Our Regeneration Areas can meet much of our housing need as long as opportunities to enhance transport, schools, parks are taken” .. with .. “Our Regeneration Areas can meet much of our housing need as long as opportunities to enhance transport, community and environmental infrastructure is taken and delivered in an integrated way.”</p>

SP2	Revitalised Neighbourhoods
Comments	<p>1) The Local Authority could not “revitalise neighbourhoods” on its own, neither would it be good practice.</p> <p>2) London Bridge is a recognised place and neighbourhood, not only actually but also in policy terms, (Mayor Opportunity Area; Strategic Cultural Area and CAZ) and a place in Southwark. The term “River Thames” is not place specific - it exists in a number of Boroughs. London Bridge was recognised as a place and a neighbourhood in the Options Draft. London Bridge is also a BID which has special neighbourhood planning status. Its exclusion from the Preferred Draft is not explained or justified and is a cause for concern.</p> <p>3) LB Business Improvement District has delivered over £1m extra funding to environmental, safety, community and business improvement projects every year, for the last 4 years. This is now set to continue for at least another five years.</p>
Change	<p>a) In 1<sup>st</sup> para - <b>replace</b> “We will” with .. “By working with public and voluntary agencies, businesses and residents, we will revitalise our neighbourhoods..”</p> <p>b) In the 2<sup>nd</sup> para – <b>replace</b> “along the River Thames” with ... “and London Bridge and Tower Bridge”.</p> <p>c) At the end of the 3<sup>rd</sup> paragraph please <b>add</b> ... “Local distinctiveness” will be delivered by integrated urban management (IUM) where the local authority works in partnership with a range of statutory, voluntary, businesses and business improvement districts committed to making “good places”. IUM involves enhancing traditional “clean green and safe” transport and streetscape improvements – with public and business involvement; area wide urban design; way finding and digital connections; pedestrian and cyclist priority; public art and street activities; green sensitive public realm improvements and concierge management - in order to drive higher levels of user care and responsibility and use of places and space. Working in this way helps create good improvement choices and better investment decisions.”</p>

**London Bridge Plan Projects**



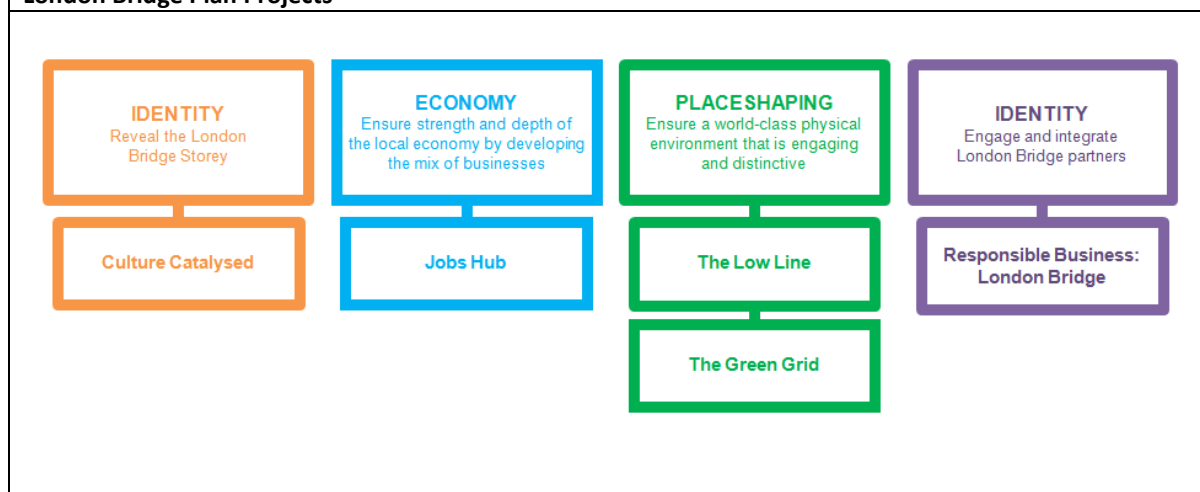
SP4	Strong Local Economy
Comments	<p>1) Opportunity Area 21 in the Mayor’s plan is seeking 25k jobs with two thirds of space and jobs being located in London Bridge, (see page 16 BBLB/2010 and note that this SPG is referenced in the London Plan). LBS has stated (LBS CAZ SPG comments 11-12-15 Appendix 1), that “greater weight” should be attached to office use, and therefore to job creation, in the Opportunity Area 21. Note also that in 2014/15 LB Southwark collected £203m in business rates, of which some £63m (31%), was collected from London Bridge BID area – this proves the concentration of businesses in this area compared to elsewhere in the Borough, and its importance to the whole economy of Southwark.</p> <p>2) Changing the commitment of 500 affordable business units to 500 “affordable business units and independent shops” provides more flexibility and promises what local residents continue to demand – more independent and different business and town centre/retail areas, and clone towns. Policies to promote and protect independents exist in the London Plan and in other modern Local Plans (Lambeth, Camden and Westminster). More independent business area characteristics is also a regeneration mechanism – as in Brixton, Peckham and Crystal Palace.</p> <p>3) CAZ and SCAs should be identified on the Figure 1 map since they are listed as Regeneration Areas on p 12. Business Improvement Districts are also Regeneration Areas – so these should be listed on p12 and shown in Figure 1.</p>
Change	<p>a) P12 After the word “aspirations.” - at the end of the 2<sup>nd</sup> sentence in the 1<sup>st</sup> para – <b>replace the rest of the paragraph</b> with: “ Business owners will know that Southwark is the Borough where their enterprises will grow and prosper. Southwark Council will ensure the delivery of 500 new affordable small business and independent shops across the Borough.</p> <p>Southwark will also see the growth of 47k office jobs and 530km2 office floor space by 2036 - with the majority of new office space and jobs being located in Southwark’s Central Activity Zone (CAZ), and London Bridge in particular. The Southwark CAZ will continue to be a focus for global office, culture and retail – and Southwark will use this focus to drive investment, transport and employment connections to other regeneration areas, town centres and high streets across the whole Borough. Southwark’s distinctive town and local centres will be places where shops, leisure, offices and community uses are competitive and popular, providing customer choice for local communities.</p> <p>Southwark Council will work with residents to assist them to be and stay financially independent – and with business agencies, local businesses and business improvement districts to make sure our residents are equipped with the skills and knowledge to access the many exciting opportunities that being in Southwark brings. “</p> <p>b) P 12 After the bullet point “<b>Strategic Cultural Areas</b>”, <b>insert a bullet point that says “Business Improvement Districts”</b></p> <p>c) In Figure 1 p13 put in <b>the boundaries of the CAZ, Strategic Cultural Area and Business Improvement Districts.</b></p>





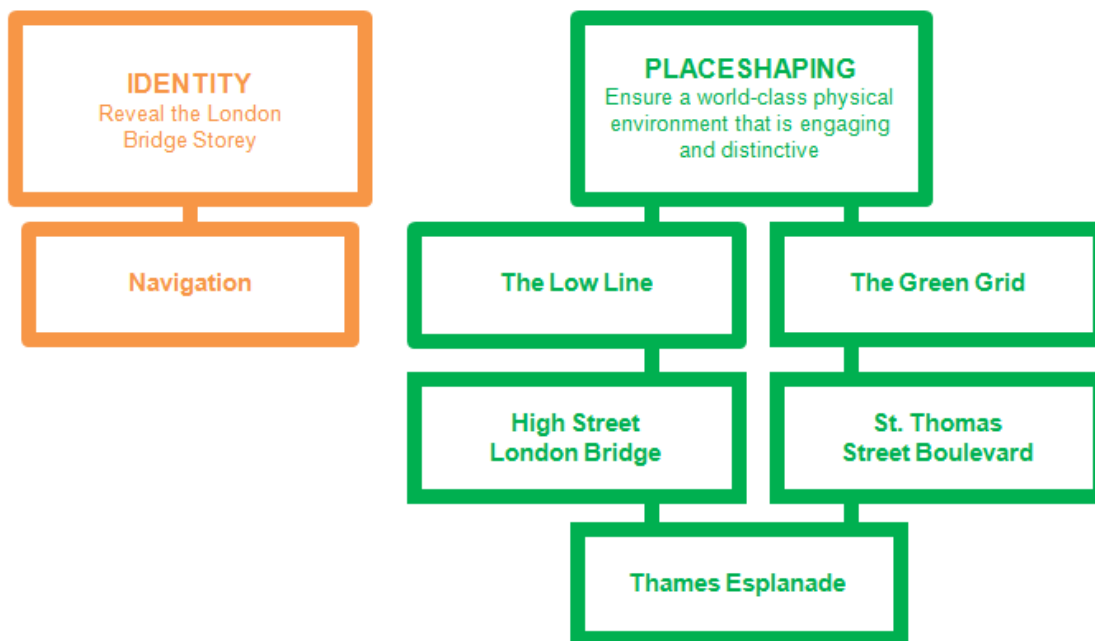
<b>SP5</b>	<b>Healthy, active lives</b>
Comments	<p>1) TLB BID carries out health and well - being projects and sees these as important to the delivery of sustainable economic development. Para 157 bullet 3 of NPPF requires “Local Plans to be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations”</p> <p>2) Note world class Eds and Meds facility on Guy’s Hospital and King’s College.</p> <p>3) Low-Line delivering green walking route.</p>
Change	a) In 1 <sup>st</sup> para, after “ We will work with residents”, <b>insert:</b> ..” public and voluntary agencies, business agencies and business improvement districts to build resilient communities, extending opportunities to all to maintain and improve their health and wellbeing”.

**London Bridge Plan Projects**



SP6	Cleaner, greener, safer
Comments	1) TLB BID carries out “clean, green and safe” projects and sees these as important to the delivery of sustainable economic development. Para 157 bullet 3 of NPPF requires “Local Plans to be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations”.  2) “Southwark will be a place where walking, cycling and public transport is the most convenient, safe and attractive way to move around”.  3) Low-Line and Green Grid big picture projects.  4) GI audits. Bio-Diversity audits.  5) Targets?
Change	b) In 1 <sup>st</sup> para, after... “We will work with local people, <b>insert ...</b> ” voluntary groups, business agencies and business improvement districts to deliver the very best so that the Borough is a clean, green and safe place to be..”

**London Bridge Plan Projects**



## Development management policies

### SP2 Revitalised neighbourhoods

DM 9	Design of places
Comments	<p>1) It is confusing to have 4 general design policies, (DM8-11). DM8 and DM11 (residential density; design and exemplary design for very high densities) need to be kept, (though there is an argument to put DM8 into Revitalising Neighbourhoods). However DM9 and 10 should be combined since both are missing a number of important building/place good design criteria and both in some cases repeat policy themes. In addition the function of “good design” should be more clearly spelt out – and this could be done in one single policy and set of criteria as set out below. Neither of the current policies takes into account historic natural / built assets nor provides a mechanism for a decision mechanism that is particular to Southwark – a Borough where old and new sit together – and often sit well.</p> <p>2) By having a more comprehensive single design policy – the Tall Buildings policy DM 12 can be slimmed down and focused on key criteria – in addition to the new proposed general Design Policy DM9.</p>
Change	<p>a) <b>Replace</b> the existing DM9 with the following new DM 9 policy which combines DM9+10 and other key design criteria that both policies have not covered:</p> <p>b) DM 9 - <u>Designing Good Buildings and Places</u></p> <p>c) Planning permission will be granted for good building and place designs. This means development that achieves high architectural and urban design quality by improving the function, sustainable fabric, appearance and character of the proposal and its area. Good building and place design will ensure:</p> <ul style="list-style-type: none"> <li>- the height, scale, massing and arrangement of development responds positively to the existing townscape, (rhythms; symmetries; uniformities), character and context. This will include sustaining and enhancing historic environments, designated views and heritage assets in a manner appropriate to their significance, taking into account both the existing and proposed character of the area.</li> <li>- quality local distinctiveness and architectural design and character</li> <li>- sustainable design and construction. This will mean increasing green infrastructure in terms of greening space and buildings and better energy management and decentralisation. There will also be an increase in and better flood, heat and water management</li> <li>- an urban grain and site layout that takes into account and improves patterns of development and movement, permeability, safety and identity.</li> <li>- buildings, public spaces and routes are positioned according to their function, importance and use – and in so doing create a public realm that is safe, easily recognisable (legible), attractive and prioritises pedestrians, cyclists and public transport/interchanges first, then service vehicles and private vehicles last. Street clutter should be avoided. Measures to reduce air pollution will be promoted.</li> <li>- building and public realm being built in good quality materials that respond to local character and/or provide place identity and support good maintenance practice and capability.</li> <li>- development that responds to natural features including preserving gardens and open space and at every opportunity increases greening, open space and tree planting.</li> <li>- accessible and inclusive design for all ages and people with disabilities.</li> </ul>

DM 10	Design Quality
Comments	<p>1) See DM 9</p> <p>2) Design Review Panels at the pre application stage of planning applications are recommended by the NPPF at para 61 and 62. As we built more densely to cater for population, household and job growth, development schemes need to be better scrutinised and “owned” by residents, businesses and councillors in the local areas. TLB proposes an improved LBS bespoke “Design Review” mechanism for particularly large and dense schemes – so better design and management can be delivered when the scheme is built. This process should be more transparent and TLB would welcome the opportunity to positively input into the process.</p> <p>3) The ‘Design Review’ process should also be applied to the development of opportunity sites and development briefs.</p>
Change	<p>a) <b>Delete</b> existing DM10 and replace by proposed new DM9 above. Integrate “Reasons” of DM9 and 10 under the new DM9. Create new Design Quality Policy which is about how to achieve good quality.</p> <p>b) <b>“Insert new : <u>DM 10 Achieving Good Design</u></b></p> <p>c) Good design, particularly for major, complex and high density developments need higher levels of managed open scrutiny at a stage where changes can be made in a non - confrontational way. This in turn will enable more support for the development Southwark needs to support population and household growth and an increase in sustainable economic development. To achieve this LBS would like to introduce “London Bridge Open Design Review Panels (LBODRP)”. The LDORP would only review the design of tall buildings, major developments and schemes at the highest density (650-1100 hab rooms per hectare) at the pre application stage of schemes. Panels will be paid for by scheme promoters. Reviewers will be professional built environmental experts and will not live or work in the Borough and will be selected by LBS. Councillors and representatives of resident and business groups and all BIDs will be invited to listen and ask questions along with reviewers. Meetings will be open to the general public. DRP summary comments will be reported to Planning Committee. When Planning Committee considers the primary application of such schemes a residential group and business group representative from the design panel will be invited to comment, (but not vote) in addition to any normal speaking rights. If the scheme is in a BID area – in addition a BID representative will be invite to speak”</p>

DM 11	Residential Design
Comments	1) See SM 9.
Change	a) See DM 9.

DM 12	Tall buildings
Comments	1) See SM 9.
Change	<p>a) DM12 c) – <b>insert</b> DM8, 9 and 10.</p> <p>b) DM12 d) and g) to remain and <b>add</b> in “no unacceptable harm from wind turbulence and noise – and to aviation navigation and telecom/broadcast functions”</p> <p>c) DM12 e), f), h) <b>to be deleted</b> – these are all covered in proposed new DM9. It should be</p>

	made clear that Tall Building schemes must comply with DM8, 9, 10 and 12 as a minimum. Reference should also be made to Historic England Advice Note 4 Dec 2015 on Tall Buildings.
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DM 14	Listed buildings and structure
Comments	<p>1) DM 14 is a poor policy compared to DM15 and DM16. DM 14 asks schemes to simply “avoid unjustified harm” – it should first seek to “conserve and enhance” – this should be changed. NSP Options version (2014) had a policy to support “locally listed non designated heritage assets” – this policy is no longer in the NSP Preferred Version (2015) – it should be reinstated. Its absence contradicts Southwark’s SP2 Policy on the importance of “heritage led regeneration”.</p> <p>2) Changes propose an overall policy on “heritage” that reflects both NPPF guidance to “preserves and enhances, in a manner appropriate to the heritage asset significance” – but also takes in to account the “existing and proposed character of the area”. This would allow LBS and Neighbourhood Forums to create and consult on visions for the future for different areas via management plans; master plans; SPG and or Neighbourhood plans.</p>
Change	<p>a) <b>Change</b> DM 14 and 15 and replace with two new policies:</p> <p>b) <u>“Policy DM14 Heritage</u></p> <p>c) The Council will preserve and enhance Southwark’s rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens – in a manner appropriate to their significance, taking into account both the existing and proposed character of the local area.”</p> <p>d) <u>“Policy DM 15 – Conservation Areas and Listed Buildings</u></p> <p>e) <u>15.1 Conservation Areas</u></p> <p>f) In order to maintain the character of Southwark’s conservation areas, the Borough will:</p> <ul style="list-style-type: none"> <li>a. take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;</li> <li>b. require that development within conservation areas to preserve or enhance the character or appearance of the area in a manner appropriate to its significance and take into account both the existing and proposed character of the local area;</li> <li>c. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area, unless circumstances are shown that outweigh the case for retention;</li> <li>d. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area - unless circumstances are shown that outweigh the case for retention; and</li> <li>e. preserve trees and garden spaces which contribute to the character of a conservation area and which provide a setting for Southwark’s architectural heritage.</li> </ul> <p>g) Development which causes harm to the significance of a conservation area will not be permitted unless there are public benefits to the development that outweigh that harm, taking into consideration the scale of the harm, the significance of the asset and both the existing and proposed character of the area.</p> <p>h) <u>15.2 Listed Buildings</u></p> <p>i) To preserve and enhance the borough’s listed buildings, we will:</p>

	<ul style="list-style-type: none"> <li>- prevent the total or substantial demolition of a listed building unless exceptional circumstances are shown that outweigh the case for retention;</li> <li>- resist proposals for a change of use or alterations and extensions to a listed building where it considers this would cause harm to the special architectural and historic interest of the building; and</li> <li>- resist development that it considers would cause harm to the setting of a listed building.</li> </ul> <p>j) We will refuse permission for development which results in substantial harm to, or the loss of, a listed building unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all the following apply:</p> <ul style="list-style-type: none"> <li>- the nature of the heritage asset prevents all reasonable uses of the site; and</li> <li>- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and</li> <li>- conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and</li> <li>- the harm or loss is outweighed by the benefit of bringing the site back into use.</li> </ul> <p>k) <u>15.3 Other heritage assets and on-designated heritage assets</u></p> <p>l) We will seek to protect and enhance other heritage assets including non-designated heritage assets (including those on and off the local list), Parks and Gardens of Special Historic Interest – in a manner appropriate to their significance, taking into account the existing and proposed character of the local area.”</p>
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DM 15	Conservation area
Comments	1) See DM 14.  2) Review Conversation Area Plans.
Change	a) See DM 14.

DM 20	River Thames
Comments	1) The London Plan requests London Boroughs to implement the “Thames Path” as part of the “Walk London Network” map 6.3 p222. A path that is easily accessible, safe and can accommodate significant use. It asks that “Legible London” is promoted; that audits and local consultations are undertaken and then quality schemes implemented i.e. declutter; good shared space; simplified streetscape and access for all. In addition Policy 7.29 “Thames” p 275 asks Boroughs to identify in their Local Plans policies to cover “design, development, regeneration, use and improved access”.
	2) The Thames path between London Bridge City Pier and Southwark Cathedral along the Thames is complicated, narrow and dark. It is tortuous to get to Tooley Street/London Bridge Station and very steep to get to London Bridge itself. TLB requests LBS in the NSP commits in both Policy DM 20 and its Infrastructure Policy (DM47) to deliver, with partners including TLB, the “Southwark Thames Esplanade” which would widen and improve access to the Thames and Thames Path for workers; residents and visitors. In developing the Area Vision for London Bridge and the London Bridge Plan Feb 2016 Appendix 4 – TLB carried out public consultation and this improvement was significantly supported. Increasing river access and river transport is a key aim of the TfL River Action Plan and the 2050 London Infrastructure Plan.

	<p>3) Needs CIL / S106 inclusion.</p> <p>4) + improved access to the riverfront via London Bridge City.</p>
Change	<p>a) At the end of point 3, at the end of the sentence....full stop, and then <b>insert:</b></p> <p>b) “The riverfront walk will be improved to support more use; more visitors; businesses; public art and performance. The TLB “Thames Esplanade” project at London Bridge City Pier will promoted improve access between London Bridge interchange and the river; to increase river transport and to increase use of the the river walk and the river itself. There is poor access between London Bridge City Pier and Cathedral Square. This infrastructure will ensure the proper completion of the Thames Path and Walk London Network for this part of the network. It will contribute to the London Plan and London Infrastructure Plan 2050 aim to increase river transport to 12 million by 2020. This project will also be used to explore increasing river freight – which in 2013 took the equivalent of 250,000 vehicle deliveries off the roads (TFL River Action Plan).</p>

## SP4 Strong, local economy

DM 23	Transition of preferred industrial locations to mixed use neighbourhoods
Comments	<p>1) FSM London Manifesto for London 2015 “Back the 99%” has as its first priority “more affordable premises”. Such a commitment is also made in NSP SP4 – but it is not mentioned in DM23.</p> <p>2) LBS change from the Options Draft to support mixed use development on previously preferred industrial locations in inner Southwark is overall supported by TLB. However such a transition will mean a temporary loss of employment floorspace as transition development is begun. So it is critical to continue to support employment in CAZ and particularly in locations such as London Bridge to ensure no loss of jobs/office growth as places like the Old Kent Road (preferred Bakerloo Extension), gets ready for employment growth and 25k new homes. In any case LBS should have a “Strong Local Economy” policy on CAZ and London Bridge as a unique employment location on its own, not with - standing the additional role it will need to play as industrial zones transition to mixed use. It is unclear why the Preferred Option NSP does not mention London Bridge in the context of employment and economic development – this area delivers a third of business premise values.</p>
Change	<p>a) <b>Insert</b> at the end of the 1<sup>st</sup> para – “ As mixed use schemes, including business, retail and culture and housing come forward – development proposals will be required to provide an element of affordable non housing space, (discounted rents for 3 years), in addition to affordable housing elements and contributions to necessary infrastructure. This will help mitigate a London – wide small business concern about affordable business space, identified by the Federation of Small Business (London Manifesto 2015), and the London Mayor – London Plan policy 4.1.</p> <p>b) Not with standing Southwark’s policy aim to “lose no employment space over the transition period to mixed use” – the Council will particularly support traditional and ongoing employment strongholds and growth points and hubs like London Bridge to ensure the NSP job and floor space targets are met over the plan period.”</p>

DM 24	Office and business development
Comments	<p>1) Policy DM24 should be expanded to set the Southwark Economy scene and show what Southwark will do to promote jobs and business. At the moment the policy lacks ambition and a proper sense of purpose. The revised policy has drawn on LBS evidence; LEP “London 2036” and the Mayor’s 2015 FALP and consolidate London Plan and the Mayor’s 2050 London Infrastructure Plan.</p> <p>2) The Strategic Policy SP4 says LBS will provide “affordable” space but does not implement this in DM 23, 24. Affordable accommodation is also sighted by the Mayor as critical – London Plan policy 4.1 and para 4.17a makes this clear. Without emphasising the need for an affordable element, this will be lost in the “transition to mixed use” and the pressure for homes as para 4.17a London Plan explains.</p> <p>3) Policy DM 24 should also have a section on the Borough’s policy stance towards its CAZ – as requested by the London Plan (policy 2.11). This is normal in all modern London Local Plans.</p> <p>4) It is not clear from the Council documentation/studies if the 2036 target is for 34k or 47k jobs growth and 460m2 or 530m2 office floor space growth – LBS to confirm.</p>



<p>Change</p>	<ul style="list-style-type: none"> <li>a) <b>Delete</b> the existing DM 24 policy and replace with the proposed new DM24 policy that properly addresses economic growth needs and opportunities</li>   <li>b) <u>“DM24 Southwark and London’s Economy &amp; Business Development and the Central Activity Zones</u></li>   <li>c) <u>1. Business and Sector Development</u></li> <li>d) Southwark welcomes its responsibilities as a planning authority that supports both its local economy and its global city. Southwark will work with the London Mayor, the London Enterprise Partnership; Business Improvement Districts, local businesses and Education and Training agencies to develop businesses, job and training opportunities. In doing this the Borough recognises that the enterprise and employment future of the Capital and the Borough will focus on 7 sector and economy qualities:             <ul style="list-style-type: none"> <li>a) Finance, business, research, and talent services - and the location of HQs and European and international businesses</li> <li>b) Culture, Tourism, Food &amp; Drink and Retail</li> <li>c) Technology, media/creativity and tele communications including AI</li> <li>d) Public administration, health and education, including Further and Higher institutions</li> <li>e) Life sciences</li> <li>f) Environmental and transport management and low carbon industries, and the ability of</li> <li>g) London as world city to drive enterprise and innovation.</li> </ul> </li>   <li>e) <u>2. Sustainable Office and Business Space</u></li> <li>f) In Regeneration Areas (see Figure 1 and SP Policy 4), planning permission will be granted for business (use Class B1) floor space. Development must retain and preferably increase existing levels of business space (B use classes) and provide an element of small and affordable business space, (discounted rent for 3 years – built into transparent viability assessments). Where there is no demand for either the continued use of the site for businesses or for redevelopment involving re provision, this needs to be demonstrated by rigorous marketing for 18 months, and in the subsequent re use or redevelopment – mixed use schemes will be expected to come forward including an element of affordable business/office space involving discounted rents for at least 3 years. Affordable space elements would allow a wider range of businesses to start and grow, offering in turn a wider range of job opportunities and a more resilient local and London economy - thus meeting aims of a “strong and competitive economy” as set out in para 18-22 of the NPPF. Whilst business and service sectors are increasing and manufacturing declining in Southwark, the provision of some new and regular affordable space will allow for greater diversification in growing sectors and an opportunity for manufacturing businesses to better manage change – thus preserving a more sensible sector transition and higher job opportunities for a growing population.</li>   <li>g) <u>3. Southwark Central Activity Zone (CAZ)</u></li>   <li>h) Southwark’s CAZ will be supported to be a globally significant place of modern commerce, enterprise and connectivity. Southwark will give greater weight to offices in the CAZ, particularly in the Bankside, Borough and London Bridge Opportunity Area, (the North), whilst in Elephant and Castle and the Old Kent Road, (the South) employment and housing will be given equal weight.</li>   <li>i) As set out in London Plan Policies 2.10 and 2.11 Southwark will support the CAZ priorities and strategic functions as it applies to locations in its Borough. In this regard Southwark will seek to:             <ul style="list-style-type: none"> <li>a) Increase offices and support provision for a wide range of users. It will seek not to allow offices to be unduly constrained by heritage designations, whilst not compromising on local environmental quality. In doing this Southwark will take</li> </ul> </li> </ul>
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	<p>into account the existing and proposed character of local areas and the importance of the River Thames, World Heritage Sites, designated views, networks of open spaces and distinctive buildings</p> <ul style="list-style-type: none"> <li>b) Improve the area’s retail offer and grow all CAZ town centres</li> <li>c) Enhance the area’s night time economy</li> <li>d) Support the growth of the business and medical skill clusters relating to King’s and Guy’s and the area’s growing financial and business services; design and culture and TMT businesses; education/training; retail &amp; eateries, including markets.</li> <li>e) Sustain, increase and manage visitor attractions and grow the offer of the South Bank Strategic Cultural Area – across the entirety of the area</li> <li>f) Address environmental quality, the heat island effect and the need for better access. Improve public transport, walking and cycling and access along and to the River Thames. This will be done through high quality integrated urban design and management; combining public and private resources and securing greater customer care and place enthusiasm. Southwark will work with residents, business agencies and business improvement districts.</li> </ul>
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DM 25	Railway Arches
Comments	<ol style="list-style-type: none"> <li>1) Policy supported by TLB. Low Line projects need to be particularly supported because they bring together: <ul style="list-style-type: none"> <li>- New business development in previously un used or poorly used space</li> <li>- An iconic improvement project linked to infrastructure that is only found in London’s “inner” Boroughs – so these may also drive inward investment and resident pride</li> </ul> </li> <li>2) The opportunity to increase much needed small business space because “arches” can only provide space for small businesses</li> <li>3) Needs to note scale of space available.</li> <li>4) Needs to recognise transition from light industry and storage.</li> <li>5) Needs to note existing tenants and rental pressures.</li> <li>6) Needs to note partnership with Network Rail.</li> <li>7) Needs to recognise the transformation potential of the Low-Line.</li> <li>8) Need a structure in place to achieve.</li> <li>9) Site allocations for LB railway arches as per Old Kent Road.</li> </ol>
Change	<ol style="list-style-type: none"> <li>a) In the policy – <b>number</b> the existing policy DM25. 1. Then <b>insert</b> the following:</li> <li>b) “DM25.2 - Southwark will seek a range of affordable units to ensure diversity and a wide business offer. This will not exclude developing business clusters.</li> <li>c) DM25.3 - Where “Low Line” projects are being developed particular attention will be paid to commensurate public realm, walking and cycling improvements, management regimes and master plans”</li> </ol>

DM 26	Small business units
Comments	<p>1) Policy supported by TLB. Low Line projects need to be particularly supported because they bring together:</p> <ul style="list-style-type: none"> <li>- New business development in previously un used or poorly used space</li> <li>- An iconic improvement project linked to infrastructure that is only found in London’s “inner” Boroughs – so these may also drive inward investment and resident pride</li> </ul> <p>2) The opportunity to increase much needed small business space because “arches” can only provide space for small businesses</p> <p>3) Site allocations for LB railway arches as per Old Kent Road.</p>
Change	a) After DM26.3, <b>insert:</b> “DM26.4 Small businesses and small and affordable business space will particularly be important for all Low Line projects”

DM 27	Town and local centres
Comments	<p>1) London Bridge (LB) exhibits all the signs and characteristics of a major centre – its designation in the NSP and Annexe 2 Mayor’s London Plan should be changed. LB is a high growth centre, not medium growth – it contains significant employment, leisure, service and civic functions – all the signs of a major centre. LB does have a significant Night Time Economy and is one of the few places in Southwark and London where this could be developed further without significant amenity issues. High growth criteria include:</p> <ul style="list-style-type: none"> <li>- High PTAL</li> <li>- Likely to experience strategically significant levels of growth with strong demand for retail, or leisure, or offices, and</li> <li>- Capacity to accommodate high growth existing or in the pipeline.</li> </ul> <p>2) LB meets all these “high growth” criteria. It should be noted that the Bankside, Borough and London Bridge Opportunity Area will deliver a density of new jobs second only to Kings Cross in the CAZ and the 5<sup>th</sup> highest of all Opportunity Areas.</p> <p>3) Support for small and/or independent retailers and shops is a strategic policy in the Mayor’s London Plan – Policy 4.9, and one modern new London Local Plans are supporting (Westminster and Camden and Lambeth). Southwark should also support.</p>
Change	<p>a) In DM27.1 Table – <b>move</b> London Bridge into the Major Town Centre category</p> <p>b) In DM27.2 <b>include</b> in the list of acceptable town centre uses – “business uses; leisure; food and drink; night time economy uses”</p> <p>c) In DM27.2.5, after the word “toilets” – <b>insert</b> - “ and make contributions (commensurate to the scale of the scheme), public realm, transport and town centre management improvements and affordable town centre space”</p> <p>d) <b>Insert</b> after DM27.2.5...”DM27.3 Southwark will promote town centre management schemes in all its town centres and work with business improvement districts (BIDS) where they are established. Southwark will encourage existing BIDS to support and advise on town centre management projects including the further establishment of BIDS.</p> <p>e) DM27.4 Southwark will seek, through conditions and planning obligations where appropriate and viable, the provision of affordable shop units suitable for small and</p>

	independent retailers and service outlets to strengthen the retail offer, attractiveness and competitiveness of town centres”
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<b>DM 35</b>	<b>Access to employment and training</b>
Comments	1) Employ SE1.
Change	a) <b>Insert</b> after DM35.4 – “DM35.5 Southwark will work with Business Improvement Districts, business agencies and employment and training organisations to promote and provide access to job opportunities and training. Funding from s106 agreements and CIL and the areas they were derived from will be published and partnership schemes will be established to provide these valuable projects”.

<b>DM 36</b>	<b>Outdoor advertisements and signage</b>
Comments	1) As adverting revenues increasingly move online, hoardings should increasingly become a positive addition to the public realm and good urban management rather than an eye soar. LPAs need to be creative in developing environmental improvements.
Change	a) <b>Insert</b> after DM36.4 – “DM36.5 – Where significant outdoor adverts are granted planning permission, Southwark will ensure conditions for schemes to contribute to public art; local greening and public realm management and good urban management messages. Funds will be spent by the LPA or in BIDs by the BID company, or in kind by the applicant”

### SP5 Healthy, active lifestyles

DM 38	Healthy developments
Comments	
Change	a) After DM38.2 <b>insert</b> – “DM38.3 – Where “area visions” set out proposals for improving health and well - being, either through land use proposals, public realm improvements or people support programmes, (a need having been identified), Southwark will seek to support these aims in its development control decisions, area/neighbourhood plans and master plans – through conditions and s106/CIL contributions where appropriate and viable”.

DM 39	Leisure, arts and culture
Comments	1) London Plan Policy 4.6 and para 4.32 and 4.33 – specifically seek Boroughs to protect and enhance Strategic Cultural Areas – Bankside, Borough and London Bridge are in such a Strategic Cultural Areas.
Change	a) After DM39.3, <b>insert</b> – “DM39.4 – Southwark’s Central Activity Zone (Bankside, Borough, London Bridge and Elephant & Castle) contains a “Strategic Cultural Area” (SCA) running along the Thames. Along with the Mayor, local residents, businesses and the business improvement districts that cover this area – Southwark will seek to enhance the offer and environment of the SCA by: <ul style="list-style-type: none"> <li>- Supporting public transport, walking, cycling and public realm improvements including performance and activity space</li> <li>- Developing and inward investing new attractions and by</li> <li>- Implementing the “Bankside, Borough, London Bridge Low Line” walking and cycling project; by using it to be a new link for the SCA and by promoting it as a new cultural attraction and destination in its own right”</li> </ul>

DM 42	Public transport
Comments	1) Comments to follow.
Change	a) XXX

DM 43	Highway impacts
Comments	2) Comments to follow.
Change	a) After DM43.2, <b>insert</b> - ...”and any schemes for improving walking and cycle, including road calming and crossings. In any case, demonstrate the road network around the proposed scheme is safe and accessible for pedestrians and cyclists.”

DM 44	Walking
Comments	3) Comments to follow.
Change	a) XXX

DM 45	Low Line walking routes
Comments	<ol style="list-style-type: none"> <li>1) By using the term London Bridge instead of Maltby Street, this Low Line project will be more recognisable to more Londoners and visitors.</li> <li>2) These walking and cycling projects are described as being delivered “across the Borough” and they link local and strategic public transport hubs and centres of activity – they are therefore “strategic”</li> <li>3) Policy DM45 should better define what the Low Line projects are and be more clear about the Borough’s commitment to them.</li> </ol>
Change	<ol style="list-style-type: none"> <li>a) After the word “routes” in DM 45 para one, insert: “(and in some cases cycling as well)” and after the words “across the Borough” <b>insert</b>: “These are strategic transport projects and initiatives”.</li> <li>b) After DM45.”supported” – <b>insert</b>: “a) Waterloo to London Bridge to Rotherhithe New Road”.</li> <li>c) DM45.1 – Low Line projects will be promoted and developed as “integrated sustainable transport, open space, leisure, cultural and business opportunities” illustrating how creative design, use and investment can provide local community improvements as well as new cultural destinations and better use of valued historical infrastructure.”</li> <li>d) <b>Delete</b> the 2<sup>nd</sup> Para under the “Reasons” heading and replace with: “ The Low Line routes being studied for investment and implementation are set out in Figure 6 p 53. They are: a) Waterloo to London Bridge to Rotherhithe New Road ...”.</li> </ol>

DM 46	Cycling
Comments	<ol style="list-style-type: none"> <li>1) Comments to follow.</li> <li>2) Note Cycle Superhighways to come. Tooley Street.</li> <li>3) Internal cycle space.</li> </ol>
Change	<ol style="list-style-type: none"> <li>a) XXX</li> </ol>

DM 47	Infrastructure improvements
Comments	<ol style="list-style-type: none"> <li>1) The 2050 London Infrastructure Plan (Update March 2015) identifies the strategic importance of walking and cycling - “London will be greener”. The 3 Low Line projects are strategic “cross Borough” multipurpose infrastructure projects and should be included in DM47. The proposed London Bridge Esplanade project is strategic because it would implement the Thames Walk in this part of London and would increase access along the Thames and support improved river transport which is a strategic aim for the Mayor. The TfL River Action plan aims to take river transport to 12 million by 2020 which is in the lifetime of the proposed NSP.</li> <li>2) The NSP is proposing to include consulted on and agreed “Area Visions”. These should be in the NSP and TLB at Appendix 3 has submitted a proposed Area Vision for London Bridge. Area Visions should include 3-6 Area Infrastructure Priorities – in addition to those identified as Borough wide projects. “Area Stakeholders” should have an opportunity to agree and include important infrastructure projects particularly</li> </ol>

	<p>supported through consultation on the Local Plan. Area Vision Infrastructure Priorities ought to receive a proportion of CIL collected in the areas and 100% of s106 revenues.</p> <p>3) The assessment and choice for the NSP seven priorities in DM47 need to be revealed and understood. These do not consistently appear as “priorities” in the Southwark Infrastructure Plan or in the CIL 123 List. It is not clear on what basis they have been put forward. The “Reasons” paragraph for DM47 suggests these seven will “facilitate the provision of more homes and jobs in Southwark” – this needs to be evidenced in comparison with other key infrastructure projects.</p>
Change	<p>a) The existing DM47 to be <b>labelled</b> “A”</p> <p>b) After DM47.7 insert: “DM47.8 The 3 Low Line walking and cycling routes: (a) Waterloo to London Bridge to Rotherhithe New Road ...”</p> <p>c) DM47.9 The Thames Esplanade River Access improvement”</p> <p>d) After DM 47.9 <b>insert</b> – “B. Area Visions for Southwark’s neighbourhoods that have been consulted on and agreed will have the opportunity to put forward up to 6 additional infrastructure projects. 25% of CIL revenues and 100% of s106 agreements will be allocated to these identified projects for funding support.</p>

### SP6 Cleaner, Greener, Safer

DM 50	Protection of amenity
Comments	1) As proposed in NSP, DM50 is pessimistic and negative about “amenity”. The policy should be changed to support “improvement and innovation”, offering designers to show how development can maintain and improve amenity.
Change	a) <b>Delete</b> DM 50 Protection of Amenity and <b>replace</b> with:  b) “DM50 <u>The Promotion of Amenity and Good Urban Management</u> c) Planning permission will be granted for development that promotes and delivers good and innovative levels of amenity and urban management to present or future occupiers or users of buildings and local areas, taking into account the existing and proposed character of the local area.  d) Applications for development will particularly be supported if they <ul style="list-style-type: none"> <li>- Maintain and/or improve the relationship between buildings and occupiers</li> <li>- Show that visual, light, noise and odour intrusion is reduced or minimalised</li> <li>- Improve neighbour to neighbour landscaping and good design</li> </ul> e) Demonstrate how the good urban management associated with the proposed new development will be achieved”

DM 53	Biodiversity
Comments	1) Comments to follow.  2) List London Bridge SINCS  3) GI audit. Bio-Diversity Audit as policy and directing spend.  4) Targets?
Change	a) XXX

DM 54	Trees
Comments	1) Comments to follow.  2) GI audit. Bio-Diversity Audit as policy and directing spend.  3) Targets?
Change	a) XXX

DM 60	Improving air quality
Comments	1) Comments to follow.  2) Note current levels of air pollution.  3) Fresh Air Squares. More. Monitoring.



	<ul style="list-style-type: none"> <li>4) Note schools.</li> <li>5) Targets?</li> <li>6) Extend Air Quality Focus Areas to include all of London Bridge.</li> </ul>
Change	a) XXX

<b>DM 63</b>	<b>Reducing flood risk</b>
Comments	<ul style="list-style-type: none"> <li>1) Comments to follow.</li> <li>2) Note LB as Critical Drainage Area</li> <li>3) Note Vertical Rain Garden.</li> </ul>
Change	a) XXX

## Implementation

DM 64	Infrastructure
Comments	1) Comments to follow.
Change	<p>b) The 1<sup>st</sup> para in DM64 should be <b>labelled</b> “DM64.1”. After this paragraph <b>insert</b>:</p> <p>c) “DM64.2 Integrated Urban Management</p> <p>d) As development come forward to support job and home growth Southwark recognises the importance of quality urban design, integration, maintenance and management; combining public and private resources and critically - securing greater customer care and place enthusiasm. Southwark will work with residents, business agencies and business improvement districts to improve place shaping, development decisions and urban management.</p>

DM 64	Infrastructure
Comments	1) Simplicity and clarity is needed in relation to “development mitigation and support funds” otherwise the local planning system and service will lose credibility, support and purpose.
Change	<p>a) The 3 paragraphs in DM65 should be <b>numbered</b> 1-3. After DM65.1 <b>insert</b> a new DM65.2, whilst .2 and .3 are re numbered –</p> <p>b) “DM65.2 <u>Development Mitigation and Support Principles and Delivery</u></p> <p>c) The key principle of both the community infrastructure levy and planning obligations is to mitigate unacceptable impacts on or around the development site and then in the neighbouring area as a priority. “Mitigation” - aims to negate or reduce the impact of a development that is in principle acceptable, (like traffic management). Support – is where a proposal that is generally acceptable contributes to further social infrastructure costs, ( like local school contributions). Mitigation charges should be proportionate and related to the size and scale of the development, taking into account viability. For these reasons a minimum of 25% of CIL revenues and 100% of s106 agreement funds will be spent in the local area/neighbourhood. Information on these funds will be shown every quarter and annually. Information will be shown in 4 stages: “funds negotiated; arrived; available to spend and spent”. LBS will consult on and agree a mechanism for allocations and spend with residents, businesses, voluntary and business groups and business improvement districts. These funds will only be spent on up to 6 infrastructure projects identified in “Area Visions” which themselves will be consulted on and agreed by LBS.</p>

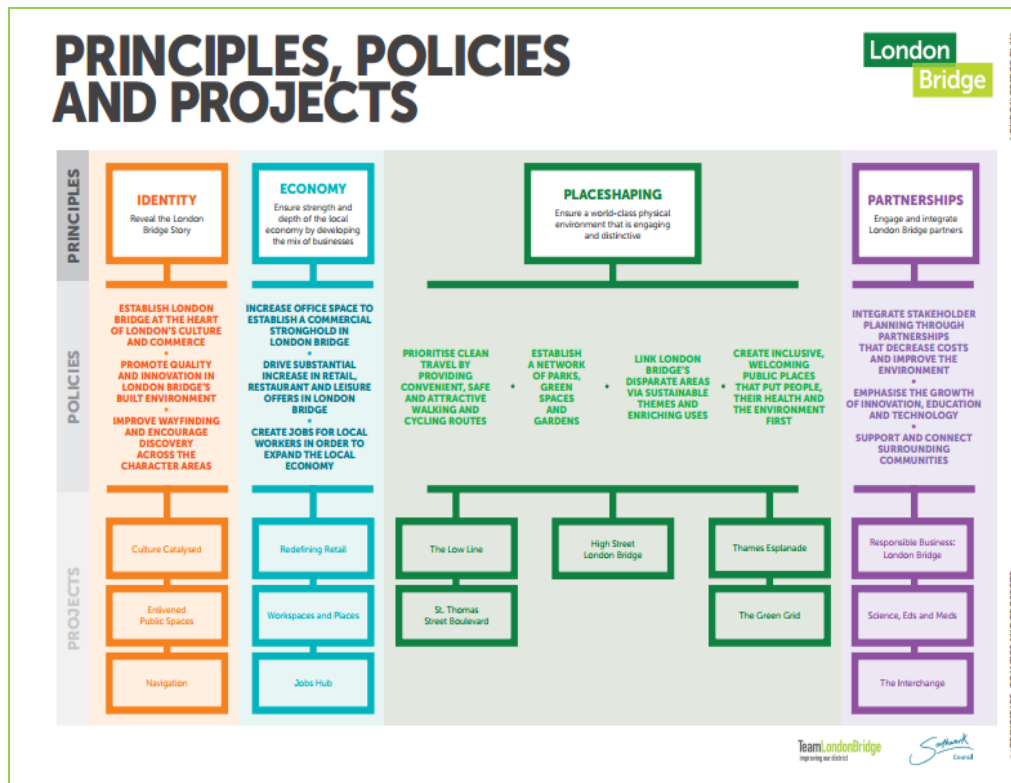
DM 68	Monitoring
Comments	1) Plans need to be able to show residents and businesses progress otherwise they will lose credibility and purpose.
Change	<p>a) The 1<sup>st</sup> paragraph in DM68 should be <b>numbered</b> “DM68.1”. <b>Insert</b> a second para:</p> <p>b) “DM68.2 – In addition to the AMR, Southwark will monitor progress on the delivery of the agreed “Area Visions” and the infrastructure funding raised and spent in each including, council funds, grant, s106 and CIL. This will enable local residents and businesses to more clearly see how and if progress is being made”.</p>

DM 69	Partnership Working and Collaboration to Deliver the Plan
Comments	1) Insert a completely new Policy DM 69:
Change	<p>a) Insert a completely new Policy DM 69:</p> <p>b) <u>“DM69 Partnership Working and Collaboration</u></p> <p>c) <u>“Plans should be kept up to date.... and be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations (NPPF paragraphs 17 and 157)”</u>. Southwark is committed to consulting with and working to deliver the NSP with all interested stakeholders. Southwark particularly welcomes organisations representing residents and/or businesses that have both views on planning Southwark and are able to take collaborative action to deliver. Southwark recognises the need to</p> <ul style="list-style-type: none"> <li>- Regularly provide standard information on how the planning process works and progress on the delivery on the plan</li> <li>- To work with stakeholders on plan delivery in an open and transparent way</li> <li>- To be clear about delivery mechanisms, using the full range of public, voluntary, community and business tools.</li> </ul>

## Appendix 1: London Bridge Plan

Please see the attached London Bridge Plan.

Also available at: [www.teamlondonbridge.co.uk/lbplan](http://www.teamlondonbridge.co.uk/lbplan)



## Appendix 2: Proposed “Area Vision for London Bridge 2016 - 2031”

London Bridge is part of Central London, and is a globally significant, historic and vibrant place of modern commerce, enterprise and connectivity. The area benefits from unique cultural, natural and historic attractions such as Borough Market, the Thames riverfront, Bermondsey Street, performance visitor attractions and the Tower Bridge World Heritage site. It also has strong network of conservation areas, open spaces, railway arches, alley ways and London views - all of which will be appropriately protected and enhanced.

Alongside these important design and historic assets, the development of the Hays Galleria, More London, the Mayor’s Office and improvements to the London Bridge Station, has ensured the area continues to deliver world class developments supporting both London’s unique Central Activity Zone (CAZ) and services to Southwark residents and businesses. There is capacity to significantly increase office, business, retail, cultural, civic, health and education offers – and to make these special to London Bridge.

### Vision Purpose: A Special Place for Business, Culture and Partnerships

London Bridge will increasingly become a national and international business, leisure and cultural destination. It will significantly grow office and business space - both at the high end to consolidate its CAZ strategic function and in terms of affordable space to ensure diversity and support for small and new business development and for social enterprises and community services. The “enterprise and purpose focus” of London Bridge will be on financial and business services; medicine; education/training; IT; design & culture; retail & eateries, including markets. A growing retail offer will establish London Bridge as a major centre around one of UK’s busiest interchanges. Retail in London Bridge will be special – it will provide conventional grocery and household shopping, but its special status will be built on growing innovative and independent services; products and food offers in the way it has to date through Borough Market. Affordable space will be provided to support this growth and reputation. London Bridge’s enhanced cultural offer will be worthy of its status as part of the South Bank’s Strategic Cultural Area. The proposed “Low Line” re use of railway arches and viaducts will symbolise the area’s originality and mix of business and leisure. More and better shops, restaurants, leisure and culture will be needed to service employment growth of some 25k workers across the South Bank Opportunity Area by 2031. Improving the campuses of Guy’s and King’s will both consolidate medicine and teaching in the area and improve business and physical connections to its neighbours. As London Bridge consolidates its business and cultural strengths it will increasingly promote local procurement; volunteering and social goal objectives, (e.g. reducing health inequalities and youth obesity and promoting well - being), through cross sector working between public and voluntary agencies, businesses and residents.

### Vision Design: Special Environment and Transport for London Bridge

London Bridge is its name – it is a place of connections and links - more than any other part of Southwark. It connects the Borough to the City and to wider London via its interchange, rail, tube and bus routes. London Bridge has 4 distinct character areas:

- the Thames Riverfront and Walk that links Tower Bridge, London Bridge and the South Bank - to the west and Shad Thames - to the east;
- the core business, retail and leisure district with Tooley Street as its spine;
- the railway arches and St Thomas Street, and finally
- The campuses of Guy’s and King’s hospitals and medical teaching schools.

These 4 areas link and overlap historical and modern townscapes, and this robust mix will be used to guide its future design and urban management. To achieve the aim of “development intensification”, the London Plan requires London Bridge to be “better integrated with its surrounding area”; for

there to be “greater use of the river” and river transport; and for there to be a strong “network of open spaces” (Opportunity Area 21). The environment and transport aims for the area will be as follows:

- New buildings will be designed to fit the area’s historic and modern character mix with an overarching commitment to transport infrastructure and quality pedestrian access. New development must improve the area’s public realm, public space, lighting and way-finding.
- North/South routes to and from the river and the station will be created or improved
- Traffic will be calmed and reduced in favour of pedestrian and cycle access
- Pavements will be widened to improve pedestrian access, safety and a “café culture”
- Little known yards, alleys and routes will be maintained and better used
- Public and civic spaces will be increased and a network of open spaces revealed and linked. Greening will soften the area’s hard townscape and will help mitigate its heat island characteristics and levels of air pollution
- Legible London signs as well as digital and sensory way finding will be used to improve the discovery of London Bridge
- Existing architectural and historic gems will be appropriately preserved
- The “Low Line” re use of arches will also act as an east/west pedestrian and cycle route across the South Bank Opportunity Area
- St Thomas Street, Tooley Street and Borough High Street will be a focus for more shops, businesses and eateries and will increasingly favour better pedestrian and cycle access.
- The riverfront walk will be improved to support more use; more visitors; businesses; public art and performance. The “Thames Esplanade” project will improve access to river transport and the river walk itself, which has poor access between London Bridge City Pier and Cathedral Square.

### **Appendix 3: Opening letter from Cllr Mark Williams to the London Bridge Plan**

London Bridge is part of Central London, and is a globally significant, historic and vibrant place of modern commerce, enterprise and connectivity. The area benefits from unique cultural and historic attractions such as Borough Market, the Thames riverfront and Bermondsey Street, all of which must be protected and where possible enhanced. Alongside these important assets, ongoing transformation of the area has delivered world-class developments that have helped raise the profile of Southwark and London as a whole. Completion of the new London Bridge station will greatly improve national and local transport links and contribute to an enhanced retail offer and public realm, helping to support continued growth of office, retail, cultural, civic and health uses in the area.

Given this context, we welcome the publication of this London Bridge Plan for Team London Bridge's Business Improvement District (BID). The plan sets out a strategic approach to conserving and enhancing the unique identity of the area in a highly accessible format. We have appreciated Team London Bridge's proactive approach to developing this plan and inviting our input; and acknowledge the extensive engagement work, with multiple stakeholders, that has informed the aspirations for the area embodied in this plan.

The key objectives and themes of the plan are positive ones that we share – creating better walking and cycling connections; protecting, enhancing and better revealing the character and history of the area; boosting employment through the provision of office space (appropriate in this central London location close to the City); improving the retail, restaurant and leisure offer; making the most of opportunities in the railway viaduct arches, as part of improved pedestrian-friendly streetscapes; and better integrating and connecting Guy's and King's campuses into the wider area.

Indeed many of these objectives are reflected in the emerging policies and proposals in the council's New Southwark Plan. For example, the current version includes policies addressing cycling and walking, supporting the 'Low Line' walking route, securing high quality design of places and buildings, protecting the historic environment and natural heritage, and promoting business development including small business units and development of the railway arches.

Given these strong overlaps we believe that the London Bridge Plan is broadly aligned with, and will assist the delivery of, the council's planning policies for the BID area. We will use this plan to prepare the area vision for London Bridge; this will be formally consulted upon along with other area visions as part of the New Southwark Plan. We look forward to continuing to work with Team London Bridge to coordinate our ongoing efforts to improve the area for Southwark's residents, workers and visitors.

**Cllr Mark Williams,  
Cabinet Member for Regeneration and New Homes**

## Appendix 4: Team London Bridge comments on the CAZ SPD Sept 2015



**TeamLondonBridge**  
improving our district

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Mr Gerard Burgess

Senior Strategic Planner  
Greater London Authority  
City Hall The Queens Walk  
London SE1 2AA

8 December 2015

Dear Gerard,

Thank you for presenting the draft CAZ SPG at the CRP meeting last week, below please find:

### **Team London Bridge's Consultation Comments and Proposed Changes to the London Plan 2015 Draft Central Activity Zone Supplementary Planning Guidance - September 2015**

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## Introduction

### Team London Bridge and London Bridge BID – purpose and aims

The comments made by Team London Bridge (TLB) on the Mayor’s Draft Central Activity Zone Supplementary Planning Guide September 2015, (CAZ SPG), reflect the purpose and aims of TLB. The 2016-21 Team London Bridge (TLB) Business Plan<sup>1</sup> sets out the Business Improvement District’s (BID) aims and key projects. Our aims and projects have developed out of local public consultation with over 310 businesses, with over 300 people participating in stakeholder workshops and 400 individual comments, as well as taking into account local and strategic planning and economic strategies. A second BID extension to 2021 was won in 2015.

TLB has 4 key aims:

- **BUSINESS: Improve and grow business space, activity and productivity.** Consolidate London Bridge as a national and global location for business – particularly professional, business services, medical, ICT and creative businesses – in small as well as large workspaces – offering both premium and affordable business space.
- **RETAIL: Better and more retail.** Increase the amount and range of retail in the area for businesses; employees, visitors and residents. Employees in particular want more comparison shops and would like to see the fresh food and eating trend grown.
- **PEDESTRIANS & CYCLISTS: A place that is safe, accessible and liveable.** Build on London Bridges’ public transport accessibility by improving the walking and cycling environment. Not just “cleaner, brighter and safer streets” – but better designed and greener public spaces and public realm that calms traffic; manages servicing, supports development and business growth – but prioritises pedestrians and cyclists. Because of London Bridges’ location, the following is particularly important: pedestrian access and egress in relation to the station, and the River Thames. Also better access along and between St Thomas’s Street, Railway viaducts and arches, Tooley Street, Borough High Street and the River Thames.
- **CULTURE: Traditional and new – in the same place.** Increase London Bridge’s identity as both a place for world class heritage, architecture and urban design – and as a place for “secret, edgy, buzzy and new” culture, events and leisure. A place for the family, for youth and for new attractions.

### The Context of TLB Comments on CAZ SPG

London Bridge BID sits within the CAZ and the “South Bank, Borough and London Bridge Opportunity Area”. TLB has been designed to work with partner agencies and local government to deliver the strategic functions of the CAZ in this part of London – including 25k jobs and 1,900 homes by 2031<sup>2</sup>

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<sup>1</sup> [http://www.teamlondonbridge.co.uk/gfx/uploads/pres\\_16092015180305.pdf](http://www.teamlondonbridge.co.uk/gfx/uploads/pres_16092015180305.pdf)

<sup>2</sup> **LondonBridge,Borough&Bankside Opportunity Area Nos 21**

Area (Ha):155

Indicative employment capacity:25,000

Minimum new homes:1,900

OAPF progress: 4

This area has considerable potential for intensification, particularly at London Bridge station and its environs, complemented by improves to public transport and interchange facilities, better pedestrian integration with the surrounding area and greater use

TLB supports the need for and delivery of the strategic functions of the CAZ, i.e. premiere business and office locations; arts, culture and leisure and world class heritage, environment and transport.

It is quite clear from TLB aims that “promoting housing and homes in London Bridge” is not a primary aim. Whilst sharing the Mayor’s view that the strength of the CAZ derives from its “rich mix of local and strategic uses, (including homes), forming the globally iconic core of one of the world’s most attractive and competitive business locations... (London Plan Policy 2.10 CAZ – Strategic Priorities)” – TLB would have preferred this critical policy had put the word “strategic” in front of “local” . TLB believes that to preserve the CAZ’s preeminent position, its **strategic functions** must always be the first priority in this unique area. Whilst existing residential communities must be protected and supported, new development and new residential development must understand the importance of CAZ becoming a world city core, operating on a 24 hour basis primarily for enterprise, culture and entertainment.

**Team London Bridge (TLB)** would like to thank the Mayor for producing the CAZ SPG and giving Londoners and stakeholders a chance to comment. TLB has followed its 12 “proposed changes” with “justifications”. TLB has made “Proposed Changes” comments on all the sections in the SPG with the exception of the Section 6 CAZ Geographies – but on this Section TLB would like the Mayor to consider making the Strategic Annotated Diagram and Sector Clustering map much clearer and so people and stakeholders can recognise areas more easily. TLB would also like to see the SPG include less words and more case studies and boxed information actually showing how the CAZ London Plan Policies should be delivered. TLB has focused on:

- The importance of the CAZ strategic functions
- The importance of the CAZ economic function and developing jobs, office and workspace
- How BIDs can support the delivery of CAZ London Plan policies
- CAZ town centres and frontages
- Tall buildings and public realm
- Interchanges

## **Summary of TLB Proposed Changes on CAZ SPG**

### **CAZ SPG Foreword and Introduction**

1. Supporting CAZ Strategic Functions

### **Competitive Business - Section 1**

2. CAZ SPG Table 1.1
3. Business Improvement Districts (BIDs) – Good Examples in CAZ, (pocket parks scheme and the Lowline)

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of river passenger transport. There is scope to develop the strengths of the area for strategic office provision as well as housing, especially in the hinterland between Blackfriars and London Bridges. Mixed leisure and culture related development should enhance its distinct offer as part of the South Bank Strategic Cultural Area, and partners should work to develop and accommodate synergies with the existing center of medical excellence. Account should be taken of the Tower of London World Heritage site and proposals for open space networks and transport and community infrastructure should be coordinated with those in the Waterloo and Elephant and Castle Opportunity Area and across borough boundaries.

4. Using BIDs to deliver CAZ and London Plan Policies

### **Arts, Culture, Shopping and Tourism – Section 2**

5. CAZ Frontages and town centres – London Bridge
6. Town Centre Designations

### **Environment and Heritage – Section 3**

7. Tall Buildings
8. Tall Buildings – a good example
9. Public Realm

### **Housing – Section 4**

10. Opportunity Areas with high job targets

### **Transport and Infrastructure – Section 5**

11. Interchanges
12. Innovative Interchange Projects - Lowline

### **CAZ Geography – Section 6**

## **Detailed TLB Comments – Proposed Changes and Justifications**

### **CAZ SPG Foreword and Introduction**

#### **Proposed Changes:**

1. **Supporting CAZ Strategic Functions:** Please consider asking the Mayor to include the following sentence...“ Housing, social infrastructure and community uses must not compromise the strategic functions of the CAZ – rather they should always be complementary.” after the second sentence in paragraph three.

#### **Justification:**

**Supporting CAZ Strategic Functions:** The Mayor fails to clearly and emphatically say that...“local services and homes are important – but - must be complementary to the strategic functions of the CAZ – which must not be compromised”. These commitments are actually made in the body of the SPG and in London Plan Policies 2.10 and 11. Four examples of this are set out below:

#### **Offices and CAZ Strategic Functions:**

Para 0.1.7...Housing, social infrastructure and community uses – “must not compromise the strategic functions of CAZ – rather they should always be complementary”.

Para 1.3.3 .... “to implement the London Plan CAZ policies 2.10 and 2.11, this CAZ SPG supports local policies and planning decisions that ensure agglomerations of offices and other CAZ strategic functions are not compromised by new residential development....greater weight should be given in Local Plans and in determining planning applications to the promotion and enhancement of the strategic functions of the CAZ.”

### Culture:

“The layout and design of residential should be complementary to strategic cultural and evening activities (para 2.2.9)”

### Housing:

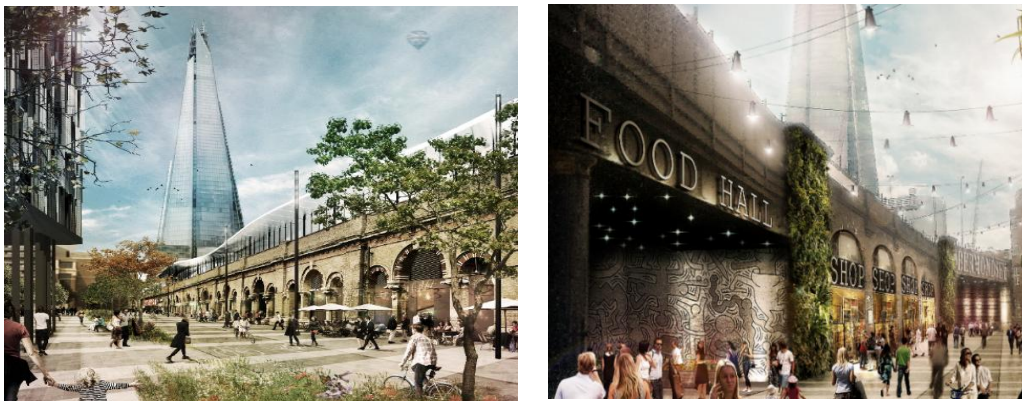
“The requirement to accommodate residential development within the CAZ should be managed sensitively to ensure new development does not strategically constrain the overall provision of office floor space” (para 4.2.2)

By including the proposed, (or similar) statement in the Foreword – the Mayor would give a clear policy and strategy focus to the SPG and the London Plan. As the SPG stands the text is indecisive and equivocal about the area’s focus. This will lead to confusion, in decision and reticence to invest. This in turn will threaten the economic strength of the area. TLB realises making suggestions about the Mayor’s own words in an SPG is a delicate matter – therefore it is with all respect that TLB asks the Mayor to consider his leading words in such an important document.

## **Competitive Business - Section 1**

### **Proposed Changes:**

2. **CAZ SPG Table 1.1:** Given the declared London need to increase new office/business space over the London Plan period and given the purpose of the strategic functions of CAZ, there should be simple additional guidance in Table 1.1 for Categories A + B areas (i.e. most of CAZ including London Bridge), stating that “schemes in designated areas of high job targets that propose to demolish offices/business space should as a minimum replace the offices as a minimum and increase if possible - before housing is allowed”. Swap and credit mechanisms would be available as well as viability assessments. But, Borough LPAs should not have to make the case for this or for small office elements and affordable office elements - since the research and policy position has already been made by the CAZ strategic designation. CAZ is itself a “special policy area” and the GLA should commit to its special and strategic purpose as a primary business location – and particularly in designated locations with high job targets.
3. **Business Improvement Districts (BID) Good Examples in CAZ:** consider inserting after the 7<sup>th</sup> bullet point in para 1.7.2 – an 8<sup>th</sup> bullet saying..” and develop place shaping improvement ideas and schemes like the “pocket park” programme for workers, residents and tourists in London Bridge delivered by Team London Bridge – and like the “Lowline project” which is now in the draft New Southwark Plan as major infrastructure project. This aims to reuse and enhance railway viaduct arches and associated public realm to enliven the area’s shopping and entertainment offer and improve the walking and cycling environment of an area that has been unused and unwelcoming”. The Lowline will run across Lambeth and Southwark and is a cross boundary project by both two Local Authorities and **five** BIDs.



4. **Using BIDs to deliver CAZ and London Plan Policies:** consider inserting a new paragraph after para 1.7.3 saying the following:
- “In order to capitalise on the investment by Business Improvement Districts in CAZ locations (16 to date), improve urban management of BID zones, and to further integrate visions, plans and available funding - London Boroughs are recommended to:
- **Consultation** - Establish bespoke approaches to consultation with Business Improvement Districts (BIDS) on major planning applications in and around BID areas, so that early discussion can support inward investment and development and Borough infrastructure plans. The London Bridge Plan that is currently being developed by Team London Bridge in partnership with Southwark Council could be highlighted as an example. The London Bridge Plan looks to influence public and private sector, will guide policy and will direct investment decisions that affect the form and function of London Bridge, ultimately vitalising the district and strengthening London Bridge’s Global position.
  - **Pre Applications** - Ensure pre application discussions on major and significant planning applications are carried out with BIDS
  - **Design Reviews** – opportunity for BIDS to be invited onto local design panels/reviews of local major schemes so urban management issues can be consider and planned for at an early stage.
  - **Planning Committees** - Consider inviting BIDS formerly to planning committees to give a view on major planning applications, and
  - **Joint Urban Management Plans** - Establish joint BID/Local Authority Infrastructure & Urban Management Delivery Plans for BID areas, that can set out and join s106, CIL, BID levies and other capital programmes and appropriate external bids – in order to maximise the benefit of area and development funding, drive value for money; ensure funding from the area is spent locally and better plan for and deliver local urban management.”

**Justification:**

**CAZ SPG Table 1.1:** Given the declared London Plan need to increase new office/business space and jobs over the Plan period it seems that there is no justification in losing space in CAZ areas that require high levels of space and new jobs – particularly in Opportunity Areas, town centres and public transport termini/interchanges. In these areas at least any loss of office and workspace should be replaced and preferably increased before any housing is allowed. Boroughs should not have to justify this because this has been done by the London Plan. We need to get on with maintaining and delivering offices/workspace and jobs which clearly the most important strategic function of the CAZ.

**Business Improvement Districts (BID) Good Examples in CAZ:** The CAZ SPG section on BIDs misses out the place shaping and environmental improvement functions that BIDs support. The **Pocket Parks** and Lowline schemes are good examples of these.

**Using BIDs to deliver CAZ and London Plan Policies:** DCLG Review of BIDS in 2014 recommended closer working between Local Authorities and BIDS on planning; licensing and infrastructure investment. See Appendix 1 for a complete list of recommendations.

## Arts, Culture, Shopping and Tourism - Section 2

### Proposed Changes:

#### 5. CAZ Frontages and town centres – London Bridge:

- a) CAZ SPG Para. 2.4.4 Says...” Retail development and comparison goods retail should be focused on international centres and other significant centres - the London Plan CAZ Frontages, (which include some clusters associated with public transport termini, for example at Kings Cross/St Pancras”. Please insert...”and London Bridge” after St Pancras.
- b) Please would CAZ SPG insert at the end of para 2.4.5 the following: “Equally, it will be important to ensure that the appropriate growth and sustainability of CAZ town centres are supported to develop and improve in order to meet their natural and /or London Plan size and growth designations.

6. **Town Centre Designations:** Please would CAZ SPG insert at the end of para 2.4.5 the following: “ Town Centre and Retail designations in Annex 2 of the London Plan 2015 are able to change subject to the submission of convincing strategic planning evidence by not only Boroughs but also Business Improvement Districts.”

### Justification:

**CAZ Frontages and Town Centres – London Bridge:** TLB is developing evidence to demonstrate the potential growth of London Bridge District Centre into a Major Centre. Currently London Plan designates London Bridge as “medium” growth potential and has no “night time economy cluster” at all<sup>3</sup>. TLB argues that London Bridge has the characteristics of major centre and not a district centre. It has “significant employment, leisure, service and civic functions”. It is developing significant retail floor space associated with the station and other pipeline developments. London Bridge also meets the London Plan “high growth” criteria<sup>4</sup> – it is in a PTAL zone of 5-6 and it is “likely to experience strategically significant levels of growth with strong demand and/or large scale retail, leisure or office development in the pipeline and with existing or potential public transport capacity to accommodate”. London Bridge does not meet the profiles for “medium or low growth”. London Bridge also has a significant “regional/sub regional” night time economy cluster.

London Bridge is a current example of a public transport termini that is significantly growing retail in an Opportunity Area location and that is planning to grow one of London’s highest number of jobs over the London Plan period. This development will be at a density of jobs per hectare that is only second to Kings Cross within the CAZ, as well as being the 5<sup>th</sup> highest across the whole of London and all Opportunity Areas<sup>5</sup>. TLB public consultation has resulted in demand for new retail and particularly for a better comparison offer and the ongoing development of food and drink businesses and night

<sup>3</sup> Ref. 208 Table A2.1 Annex 2 Town Centre Classifications and Future Directions

<sup>4</sup> Para A2.6 Strategic Guidance and Future Growth Potential Annex 2 London Plan

<sup>5</sup> Annex 1 Opportunity and Intensification Areas – London Plan

life. Business Improvement Districts that have a significant track record and future tenure for their business area, which also coincides with designated planning areas, should be able to make arguments to the Mayor of London to have Annex 2 designations changed subject to submitting appropriate and convincing evidence.

**Town Centre Designations:** Like Local Authorities, Business Improvement Districts uniquely work for town centre and business areas with resources supported by the Local Authority and businesses in the business area, based on a work programme under pinned by Local Authority support and a popular vote.

### **Environment and Heritage – Section 3**

#### **Proposed Changes:**

- 7. Tall Buildings:** Please insert the following at the end of para 3.4.2: “ London Plan policy 7.7 C explains that CAZ locations, along with opportunity and intensification areas and town centres with good public transport, will be the areas where generally tall and large buildings should be located. As the number grows not only will it be important to assess schemes individually against London Plan and local criteria – but it will also be important to ensure that schemes are assessed and co - ordinated across areas with many schemes. This will need area urban management and permeability plans and improvements covering public realm, public access, legibility and safety”
- 8. Tall Buildings – good example:** Please insert in the “photo examples” set out after para 3.34 or after para 3.4.3 – an example of a “tall building” being well integrated into the historic London streetscape. London Bridge and the Shard could be used.
- 9. Public Realm:** Please insert the following after para 3.5.5: ...” London Plan Policy 7.5 Public Realm entreats development schemes and public spaces to be “accessible, inclusive, connected – and easy to understand and maintain”. It is therefore recommended that developers and local authorities ensure simple strong urban infrastructure and management plans are developed and supported to deliver an integrated public realm vision. In those areas that have BIDS – and CAZ has the most the highest concentrations of BIDs in London – BIDS should be involved in designing and delivery public realm infrastructure and urban management plans and programmes.

#### **Justification:**

**Tall Buildings:** Policy 7.7 of the London Plan explains that areas like CAZ will be a focus of tall buildings. The rest of the policy sets out design criteria and impact issues for individual schemes. The SPG could usefully advise that developers and urban managers, (e.g. local authorities and BIDS) should also consider the impact and urban management of such schemes across areas with a growing number of such buildings.

**Tall Buildings – good example:** With the number of tall buildings being given permission and London Plan Policy 7.7 proposing that they will be focused in areas like the CAZ, the CAZ SPG should provide a “photo example” of a well-designed and sited tall building in London’s streetscape and historic environment. London Bridge and the Shard would provide a good example.

**Public Realm:** Neither the London Plan Policy on Public Realm 7.5, nor the SPG which is designed to show how the Policy could be implemented demonstrates how this could be done. Practical delivery for this critical part of the Mayor’s Plan is also somewhat missing from London Plan Chapter 8

“Implementation, Monitoring and Review”. Many Local Authorities develop streetscape guides but rarely produce infrastructure investment and urban management plans which would drive delivery. BIDs are new and growing “place caring” organisations that could help local authorities and the private sector deliver urban management of the public realm. The CAZ SPG references to the work of the Roads Task Force (3.5.7), Healthy Streets (Fig 5.6) and cycling and walking in Section 5 Transport and Movement are important but, little mention is made of the need for good and integrated “area urban management plans and delivery” – BIDs can help here, they have been designed to do this in town centres and business areas – and these predominate in CAZ.

## **Housing – Section 4**

### **Proposed Changes**

#### **10. Opportunity Areas with high jobs targets:**

EXISTING CAZ SPG - Para 4.3.2...”Substantial numbers of new jobs, relative to housing units are expected to come forward in a number of opportunity areas, for example in Kings Cross, City Fringe/Tech City, Waterloo, Victoria and Paddington reflecting the economic and mixed use function of these locations”

PROPOSED CHANGE TO READ Para 4.3.2: “Substantial numbers of new jobs, relative to housing units are expected to come forward in a number of opportunity areas, for example in Southbank/Bankside/London Bridge, Kings Cross, City Fringe/Tech City, Waterloo, Victoria and Paddington reflecting the mixed use function of these locations, but crucially the strategic importance of investing in and growing jobs, offices and workspace”.

### **Justification:**

**Opportunity area with high job targets:** These are all CAZ Opportunity Areas where the plan is to create significant numbers of jobs and therefore offices/workspace compared to the residential component. Whilst it is legitimate and important to say that the form of development is likely to be “mixed use” – it is in fact central to the strategic function of CAZ and its policies that the SPG emphasises the economic development and jobs space component that is planned to come forward in these Opportunity Areas. The paragraph leaves out the Southbank – London Bridge area which is proposed to deliver 25k jobs and only 1.9k homes – the 5<sup>th</sup> highest job allocation in London out of all the 38 Opportunity Areas.

## **Transport and Infrastructure – Section 5**

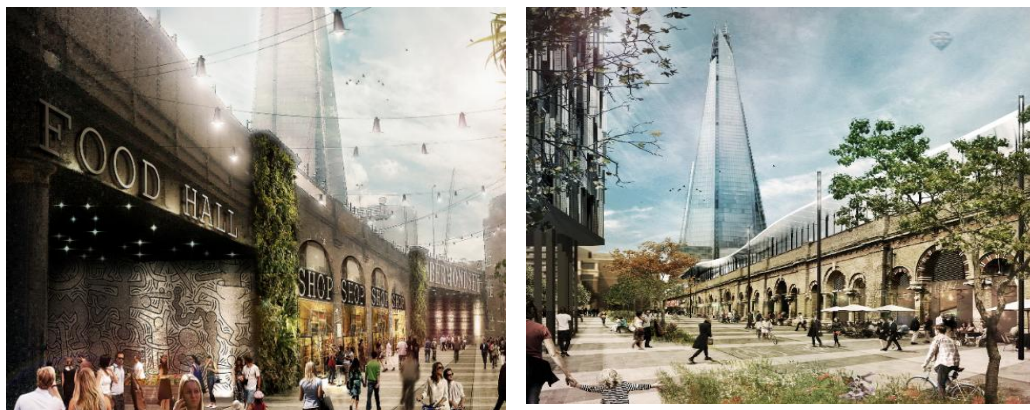
### **Proposed Changes**

**11. Interchanges:** Please insert after para 5.2.26 the following paragraph...” Improved public realm at the interchange must be complimented by area wide public realm and urban management plans and strategies that improve access, legibility and safety. This is important for both main termini and the creation of proximity – interchanges that aim to connect modes of transport in different locations. Integrating station and external public realm and urban management plans are crucial, since they can begin quickly and effectively with simple safety/lighting and wayfinding improvements in advance of more expensive



infrastructure changes that also support more development. Integrated infrastructure and urban management plans and programmes produced by Local Authorities, TfL and BIDs will support this process.”

- 12. Innovative Interchange projects:** Please insert after para 5.2.26 some “photo examples” of good completed and proposed interchange/public realm schemes. TfL should choose the best existing interchange example. Team London Bridge suggests that for a “proposed scheme” the Vauxhall/London Bridge Lowline scheme that re uses arches below a railway viaduct for new development and its neighbouring public realm for walking and cycling connecting tube lines and mainline stations would be appropriate.



### Justification

**Interchanges:** Improving Transport Interchanges: The London Plan chapter 6 on Transport mentions the importance of “interchanges” only once – in its first Policy 6.1 A d. The Draft CAZ SPG has two good paragraphs on the importance of interchanges to the Mayor’s plan reduce the need to travel, (particularly by car); improve the capacity to travel by public transport, walking and cycling – and along the Thames and support developments that have “high trip rates at places with high levels of public transport. But the two paragraphs at 5.2.25 and 5.2.26 do not go far enough and need a third explaining the importance of “wider than the station/termini” public realm plans and proximity interchanges. This is so important in CAZ.

**Innovative Interchange Projects:** The LowLine will become a unique pedestrian and cycle focused quiet-way adjacent to the restored splendour of the historic railway viaduct in Southwark and Lambeth. Its anticipated route will stretch the four miles between Vauxhall in the west to South Bermondsey in the east.

A design philosophy will highlight specific public realm and green infrastructure projects along the route to create a cohesive, healthy urban fabric – aiding navigation and encouraging exploration. The arches themselves will be activated, tenanted and programmed to support small businesses and enliven street frontages.

## **CAZ Geography – Section 6**

### **Proposed Changes - None**

### **Justification - None**

## **APPENDIX 1.**

### **DCLG Conclusions from BIDs Review November 2014**

- Provide the opportunity for Business Improvement District bodies to run local authority services by adding them to the list of relevant bodies that can challenge to run local authority services under the Right to Challenge.
- Increase involvement of Business Improvement District bodies in planning, by encouraging a bespoke approach to consultation.
- Guidance to encourage local authorities to involve Business Improvement District contribution at planning committees on relevant applications and ensure their views are heard.
- Set out in Community Infrastructure Levy guidance the importance of local authorities working with Business Improvement District bodies when developing Community Infrastructure Levy charges and identifying appropriate infrastructure.
- Increase transparency for all Business Improvement District bodies to strengthen accountability and quality, for example by requiring they publish annual report and accounts.
- Mandating the use of a standard Service Level Agreement for Business Improvement District bodies and local authorities to use that could cover a number of issues in order to encourage closer working.
- Amending the guidance to local authorities to ensure they carefully consider exempting from the Late Night Levy, any eligible Business Improvement Districts that are already funding night time economy measures.
- Allowing areas that have not been successful in previous ballots to apply to the Business Improvement District Loan Fund for support following a period of at least 3 years between ballots.
- Updating Compulsory Purchase Order guidance to ensure that local authorities properly consider a request from a Business Improvement District body to use Compulsory Purchase Order powers and provide a formal response.
- Publish guidance and best practice – particularly on closer working between BIDS and local government.
- Undertake further work on local authority charges for BID levy collection.
- Explore and bring forward ability for BIDs to progress neighbourhood plans and development orders in non-parished areas without the need to create a neighbourhood forum

Yours sincerely,



Nadia Broccardo  
Executive Director