# **MAYOR OF LONDON**



# CENTRAL ACTIVITIES ZONE SUPPLEMENTARY PLANNING GUIDANCE

**MARCH 2016** 

LONDON PLAN 2016
IMPLEMENTATION FRAMEWORK

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# **CENTRAL ACTIVITIES ZONE**

**1.7M** JOBS

>125k BUSINESSES

£139bn

**WALKING PER DAY** 

230k RESIDENTS

113k HOUSEHOLDS

2 INTENSIFICATION AREAS

2 WORLD HERITAGE SITES

400 LONDON SQUARES 4,000 LISTED BUILDINGS

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# **FOREWORD**



London's Central Activities Zone (CAZ) is the vibrant heart of our great city, with its commerce, culture, and our great offices of state and national institutions. It is the foundation of London's reputation as the pre-eminent global city in which to do business, and employs over 1.7 million people. It boasts outstanding heritage, shopping and culture, which attract millions of visitors to the capital every year, and is home to over 230,000 people, contributing to its vibrancy and identity.

Planning for the CAZ requires striking a careful balance between its strategic functions – including business,

culture, entertainment, shopping and tourism – and more local activities including housing. The CAZ Opportunity Areas in particular will have a key role in addressing the need for new housing in this unique area, as well as providing capacity to help meet business and other strategic requirements.

This document provides supplementary guidance on London Plan policies to ensure that the right balance is struck in the Zone and coordinating this across the 10 boroughs which, to varying degrees, lie within it. In general terms it places greater emphasis on the strategic functions of the Zone relative to housing, whilst recognising that some parts of the Zone are home to established communities and will play an important role in delivering new residential development. But the underlying message is that the need to accommodate housing growth does not have to be at the expense of the business, culture and other strategic functions of the Zone.

It is very important that London's nationally and internationally significant business locations in and around the CAZ are safeguarded from national proposals to liberalise office to residential permitted development rights. This SPG sets out a co-ordinated approach to the introduction of Article 4 Directions by the relevant boroughs when the current exemptions are removed in May 2019. I am determined to support businesses in the CAZ.

Central London is one of the most connected places in the world. The delivery of Crossrail and other infrastructure is facilitating development and employment growth, and improving opportunities for people within and beyond London. This document provides guidance on London Plan policies to realise development capacity and improve infrastructure, movement and services in the CAZ whilst securing a quality environment that makes it the iconic core of our city. I want to ensure that the CAZ will benefit from these investments, and be even stronger in 2020.

Boris Johnson Mayor of London

### INTRODUCTION

- 0.1.1 This Supplementary Planning Guidance (SPG) provides guidance on the implementation of policies in the 2015 London Plan¹ related to London's Central Activities Zone and, where relevant, the North of the Isle of Dogs² (see Figure 0.1). It has been drawn up in the context of the National Planning Policy Framework (NPPF).
- 0.1.2 The Central Activities Zone (CAZ) is London's globally iconic core and one of the world's most attractive and competitive business locations. It accommodates one third of London's jobs and generates almost 10% of the UK's output<sup>3</sup>. It contains the seat of national Government and has international renown for its shopping, culture and heritage. It is also home to more than 237,000 residents<sup>4</sup>.

The Central Activities Zone Islington Camden King's Cross Angel Hackney Regent's Park Tower Finsbury Hamlets Westminster Bloomsbury Clerkenwell Fitzrovia **Broadgate** Farringdon Barbican Paddington Marylebone Holborn City of London Bank Aldgate > St Paul's West End Temple Southbank London Bridge Hyde Park Strand Mayfair Kensington Gardens Waterloo St James Borough Knightsbridge Palace of Westminster North of the Isle of Dog Victoria Tower Hamlets Pimlico Kensington Vauxhall and Chelsea Southwark Canary Blackwall Wharf Nine Elms Battersea South Quay Lambeth Wandsworth Greenwich Lewisham

Figure 0.1 London's Central Activities Zone and North of the Isle of Dogs

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<sup>&</sup>lt;sup>1</sup> Mayor of London. The London Plan. Spatial Development Strategy for Greater London. GLA 2015

<sup>&</sup>lt;sup>2</sup> The North Isle of Dogs is functionally related to, but geographically distinct from the CAZ

 $<sup>^{3}</sup>$  CAZ only. Source: GLA Economics. Work and life in the Central Activities Zone, northern Isle of Dogs and their fringes. GLA, 2015

<sup>&</sup>lt;sup>4</sup> Source: GLA Intelligence (2015), based upon 2011 Census (at output area level). Note that this differs to the estimate of CAZ population in the London Plan (284,000), which is based on ward level data.

- 0.1.3 The CAZ is characterised by a diverse mix of places and functions and planning for the Zone is distributed across ten boroughs<sup>5</sup> (see Figure 0.1). The London Plan provides the framework for detailed CAZ policies in Local Plans and aims to enhance and promote the unique international, national and London-wide roles of the CAZ, supporting the distinct offer of the Zone based on an agglomeration and rich mix of strategic (see Table 1) as well as local uses.
- 0.1.4 Over the period 2011 to 2036, the ten CAZ boroughs are projected to accommodate a further 460,000 jobs (or 18,400 per annum)<sup>6</sup> of which 58% or about 11,000 per annum is anticipated in the CAZ itself. Between 2011 and 2036 population in the ten CAZ boroughs is anticipated to rise by over 450,000<sup>7</sup>. Whilst the majority of this population growth is anticipated outside of the CAZ, parts of the Zone will play a part in providing capacity. These drivers of change present unique pressures and challenges to accommodate growth within the CAZ and its environs. This SPG supports London Plan policy (2.10-2.12) to realise development capacity and improve infrastructure, movement and services in the CAZ to:
  - sustain and enhance its varied strategic functions whilst sustaining the attractions of residential neighbourhoods where more local uses predominate and
  - secure a quality environment that befits the core of a world city.
- 0.1.5 Drawing on London Plan policies 2.10 and 2.11, Table 1 provides an indicative list of some of the key strategic functions of the CAZ. It is not intended to be exhaustive. The CAZ is dynamic and new clusters of activities and functions will emerge over time. Neither does Table 1 mean that all of the uses listed below are necessarily appropriate in all parts of the CAZ this SPG provides further guidance on this matter (with particular regard to retailing for example) and allows boroughs flexibility to develop local policy for specific areas within CAZ.
- 0.1.6 The strategic functions of the CAZ and its unique character and heritage, are fundamental to London's status as a dynamic, exuberant and successful world city. Its continued success will ensure that business, visitors and investment continue to flow into the capital and support not just the economy of inner and outer London, but also the wider metropolitan area and the UK as a whole.

<sup>&</sup>lt;sup>5</sup> City of London, City of Westminster, Camden, Hackney, Islington, Kensington & Chelsea, Lambeth, Southwark, Tower Hamlets and Wandsworth.

<sup>&</sup>lt;sup>6</sup> Source: GLA Economics (2013) based on London Plan employment projections. More recent trend-based projections (GLA Economics, July 2015) suggest the CAZ boroughs are projected to accommodate 30,000 more jobs per annum over the period 2014 to 2036 (of which about 50% or 15,000 is anticipated in the CAZ itself)

<sup>&</sup>lt;sup>7</sup> Source: GLA Intelligence, based on London Plan trend based population projection (central scenario)

# **Table 1: Indicative list of CAZ Strategic Functions**

- 1) Functions associated with State, Government and Monarchy
- 2) Diplomatic organisations (such as embassies and High Commissions)
- Agglomerations of nationally and internationally significant offices and company headquarters connected with finance, business, professional bodies, associations and institutions
- 4) Uses connected with science, technology, media, communications and cultural sectors of regional, national and international importance
- 5) Centres of excellence for higher and further education and research
- 6) Medical and legal establishments of regional, national and international importance
- 7) Arts, culture, leisure and entertainment uses/clusters of regional, national and international importance
- 8) Retailing, including specialist outlets, of regional, national and international importance
- 9) Tourism facilities including hotels and conference centres
- Specialist creative clusters associated with other central activities including for example clothing, fashion, jewellery, printing, antiques, art and culture
- 11) Transport facilities, especially for public transport of regional, national and international importance
- 12) Places of worship and places of assembly of regional, national and international importance
- 13) Use and enjoyment of the River Thames
- 14) Heritage, built environment, the Royal Parks and other green and open spaces (public and private).
- 0.1.7 Alongside the range of strategic functions the CAZ also contains housing, social infrastructure and community uses to address the needs of residents, visitors and workers. Whilst they are not strategic functions of the CAZ, these locally orientated uses also play an important role in the character and function of the Zone as a vibrant mixed use area, ensuring activity and vitality at different times of the day and week. These activities must not compromise the strategic functions of CAZ rather they should always be complementary. This SPG provides guidance on London Plan policy to ensure that an appropriate balance is struck between CAZ strategic activities and more local uses, whilst allowing local flexibility to take into account diverse local circumstances across the zone.
- 0.1.8 The CAZ is more than the sum of its parts strategic and local. It is the significant agglomeration of activities combined with its character and international

reputation for business, shopping, culture, tourism and heritage that make the CAZ unique in a London, national and international context. It requires a different set of policies to the rest of the country and national policy should always be tailored to the specific and unique circumstances of the CAZ.

### The structure of this document

# 0.1.9 The SPG is divided into six sections:

**Section 1** promotes the CAZ as a **competitive business location** including guidance on the appropriate balance between offices and residential in different parts of the Zone and sensitive approaches to London Plan mixed use development and small office policy. It also contains guidance to support specialist economic clusters and to manage industrial capacity to meet the distinct needs of the Zone.

**Section 2** provides guidance on promoting strategic clusters of **culture**, **arts and entertainment** uses/activities, managing the attractions of CAZ as a global visitor destination and clarifying the approach to **retail** development in the Zone.

**Section 3** provides guidance on enhancing the distinct **environment and heritage** of the CAZ. It charts the evolution of central London, provides examples of accommodating growth through contextual change in CAZ and includes supplementary guidance on tall buildings. It highlights the importance of place shaping, public realm and inclusive access. Section 3 also addresses other environmental issues with a particular central London dimension including the urban heat island effect, surface water management and improving air quality.

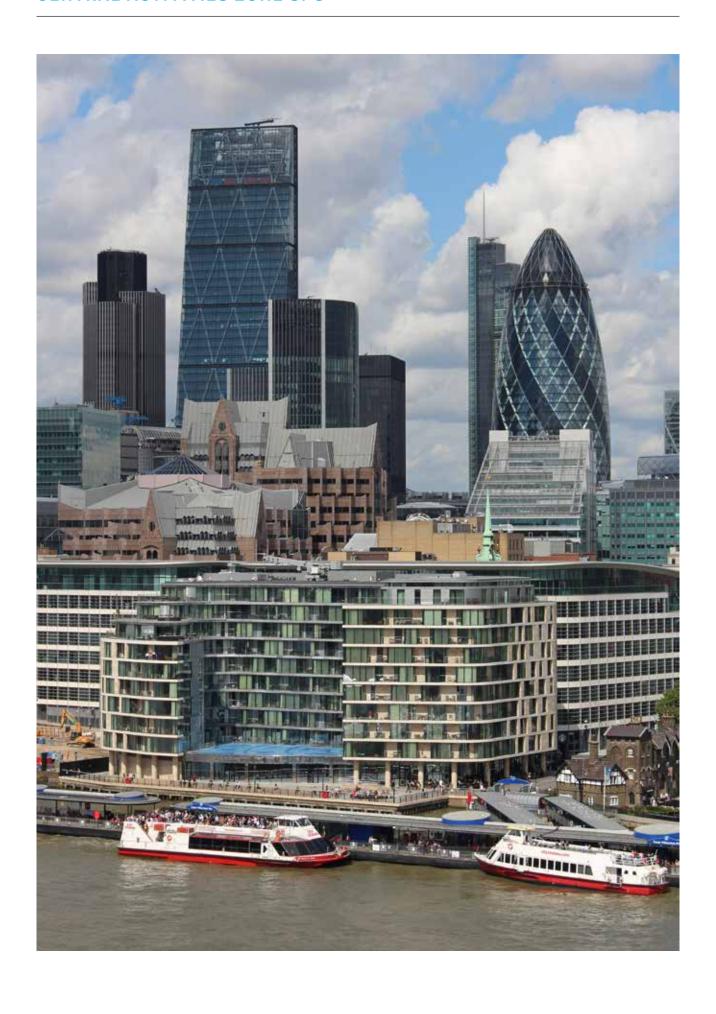
**Section 4** addresses **housing** in CAZ including guidance on identifying capacity for residential development in the CAZ without compromising strategic functions; securing mixed and balanced communities in a CAZ context and specific issues regarding vacant properties, non- permanent households and social infrastructure. It includes cross- references to the Mayor's Housing SPG where appropriate.

**Section 5** provides guidance on **transport, movement and infrastructure** including the implementation of essential new transport infrastructure schemes necessary to support the roles of CAZ. It also covers walking and cycling in CAZ; use of the River Thames; congestion, parking and servicing, and guidance on other essential infrastructure and services.

**Section 6** provides guidance on **CAZ geography** including an annotated version of the London Plan CAZ Diagram, guidance on defining the CAZ boundary in Local Plans and relationships with areas beyond the CAZ.

### Status of the SPG

- 0.1.10 As SPG, this document does not set new policy, but rather explains how policies in the London Plan should be carried through into action. It recognises that the Zone is made up of different components, with individual issues, character and opportunities. It is not a manual prescribing a universal format for development in the CAZ, but rather aims to give local authorities and other strategic and local partners matters to consider, as a starting point for finding individual solutions to suit local situations.
- 0.1.11 The SPG does not form part of the development plan but has weight as a formal supplement to the London Plan. It will assist boroughs when preparing Local Plans and will also be a material planning consideration when determining planning applications. It will also be of interest to communities, businesses, landowners, developers, planning professionals and others concerned with development in London's central area.



# **SECTION 1:**

# PROMOTING THE CAZ AS A COMPETITIVE BUSINESS LOCATION

### 1.1 Introduction

- 1.1.1 The CAZ is at the heart of London's status as a global leading city for business and is a key driver of both the London and UK economy. Together with the north of the Isle of Dogs (which is functionally related to, but geographically distinct from the CAZ) it accounts for nearly 55 per cent of London's output and over 10 per cent of UK output<sup>8</sup>. Employment in the CAZ stood at 1.7 million in 2013 with strongest representation in the professional, scientific and technical sector, finance and insurance, information and communication, and business administration and support services.
- 1.1.2 This section of the SPG provides guidance on London Plan policies that support offices and related workspace to promote the CAZ as a successful world class business location. Other business functions and planning-related factors that support the competitiveness and productivity of CAZ are addressed elsewhere in this SPG including its cultural, entertainment, tourism and retail offer (Section 2), environment and heritage



City of London (Eastern cluster and Riverside)

(Section 3), housing (Section 4), infrastructure (Section 5) and wider access to skilled labour (Section 6).

## Delivering office capacity to support business and employment growth

- 1.1.3 The CAZ is an internationally and nationally significant office location, complemented by the north of the Isle of Dogs and Tech City<sup>9</sup>. The density, scale and mix of business functions and activities in the CAZ is unique. This agglomeration<sup>10</sup> results in exceptional levels of productivity which cannot be replicated elsewhere in the UK and provides national level benefits. It requires different or tailored approaches to the application of national policy to address its distinct circumstances and is reflected in the current exemption to offices to residential permitted development rights (see Section 1.2).
- 1.1.4 The London Plan highlights the distinct needs of the central London office market and contains policy<sup>11</sup> to sustain and develop its unique and dynamic clusters of

<sup>&</sup>lt;sup>8</sup> CAZ and north of Isle of Dogs combined. Source: GLA Economics. Work and life in the Central Activities Zone, northern Isle of Dogs and their fringes. GLA, 2015

<sup>&</sup>lt;sup>9</sup> A technology, digital and creative business cluster located in the north eastern fringe of CAZ. See Mayor of London, City Fringe Opportunity Area Planning Framework, GLA, December 2015

<sup>&</sup>lt;sup>10</sup> Agglomeration refers to the concentration of economic activity in a particular location or area. Agglomeration impacts arise because firms increase their productivity levels by being located in close proximity to one another and by having access to large labour markets. See Section 5 for the role of transport in facilitating agglomeration in the CAZ.

<sup>&</sup>lt;sup>11</sup> See in particular policies 2.10, 2.11, 4.2 and 4.3

world city and other specialist functions and to ensure that there is sufficient capacity to meet identified demands across business cycles. Table 4.1 of the Plan indicates that CAZ and the north of the Isle of Dogs will need to accommodate at least 177,000 additional office jobs and 2.3 million sqm (net) office floorspace over the period 2011- 2031. More recent research by the GLA suggests that this requirement could be significantly higher<sup>12</sup>.

- 1.1.5 To accommodate projected growth in employment<sup>13</sup> and ensure that the CAZ, north of the Isle of Dogs and Tech City remain globally competitive, London Plan policy should be implemented in ways that promote and incentivise office and other CAZ strategic functions. Regard should also be had to significant changes in the way business space is being used, including new technologies, employment densities and working practices<sup>14</sup>. The need to accommodate employment growth may also entail more intensive and higher density development in parts of the CAZ and, going forward, consideration of revisions to the CAZ boundary where appropriate (see sections 6.2 and 6.3).
- 1.1.6 The Mayor and GLA will continue to monitor development capacity in the London office market through the London Plan Annual Monitoring Report<sup>15</sup> and through established or revised monitoring benchmarks in London Office Policy Reviews<sup>16</sup>.

# 1.2 Office to residential permitted development rights

- 1.2.1 Office to residential permitted development rights (PDR) were introduced in May 2013. Government granted exemptions for London's nationally significant offices in the Central Activities Zone, north of Isle of Dogs, Tech City, the Royal Borough of Kensington & Chelsea and the Royal Docks Enterprise Zone.
- 1.2.2 In October 2015 the Government made PDR permanent. The current exemptions will cease at the end of May 2019 and will need to be replaced with Article 4 Directions by local planning authorities, subject to Secretary of State approval. The Mayor is providing strategic support for a co-ordinated approach to the introduction of Article 4 Directions by the relevant boroughs to ensure that London's nationally and internationally significant business locations are safeguarded including the Central Activities Zone, Tech City, north of the Isle of Dogs, the Royal Borough of Kensington & Chelsea and Royal Docks Enterprise Zone. Selected, geographically specific and targeted areas beyond the above locations should only be included in Article 4 Directions where these can be

<sup>&</sup>lt;sup>12</sup> Peter Brett. London Office Floorspace Projections GLA, 2014, suggest that CAZ and the north of the Isle of Dogs could need more than 3 million sqm (net) office floorspace, 2011-2036

<sup>&</sup>lt;sup>13</sup> See GLA Economics (2013) op cit for London Plan employment projections and see also updated sector and trend based projections in GLA Economics (2015) op cit

<sup>&</sup>lt;sup>14</sup> Ramidus Consulting. Serviced offices and agile occupiers in the City of London. City of London Corporation, 2014; URS and Gort Scott. Supporting Places of Work Incubators, Accelerators and Coworking spaces. GLA, 2014; Peter Brett, GLA 2014 op cit.

<sup>&</sup>lt;sup>15</sup> London Plan Annual Monitoring Reports (AMR) Key Performance Indicator 8

<sup>&</sup>lt;sup>16</sup> London Office Policy Reviews have been undertaken for the GLA in 2004, 2006, 2007, 2009 and 2012

justified by local evidence<sup>17</sup>.

- 1.2.3 Evidence to support Article 4 Directions for London's nationally and internationally significant business locations could include<sup>18</sup>:
  - a) Office floorspace stock and planning pipeline, occupation, vacancy and availability rates, comparative office/residential values and employment levels/ trends
  - b) Relationship with London Plan, this SPG and Local Plan policies and local economic development strategies
  - c) Contextual background on the international/national significance of the office uses and agglomeration of high value added activities in the area, and their contribution to the output and productivity of the wider UK economy and central London office market.
  - d) Scale/significance of short/ medium/long term adverse impacts of PDR that would arise in the absence of an Article 4, for example:
    - i) ability to meet NPPF objectively assessed need for office floorspace;
    - ii) impact on occupied offices, business and employment directly through loss of capacity, businesses and jobs and indirectly through rights to amenity/ daylight etc;
    - iii) impacts on agglomeration and clustering;
    - iv) impacts on ability to assemble sites for office development;
    - v) impact on provision of affordable housing and contributions to essential infrastructure. The GLA will continue to monitor the consequences of PDR both for employment capacity and for housing outside the exempted areas (see Section 6.6 of this SPG regarding relationships with the CAZ fringe and the Housing SPG for issues relating to housing output).
- 1.3 Striking an appropriate balance between strategic functions (including offices) and residential in different parts of the Zone
- 1.3.1 The supply of sufficient office floorspace<sup>19</sup>, in terms of type, size and cost within the CAZ (and in functionally related parts of the north of the Isle of Dogs and Tech City) to meet growing demand are central to London's economic success. It is essential that the office and business space offer in these areas is not eroded. However, within these areas, differentials in office and residential values<sup>20</sup> have led to concern over the loss of office space to housing even though they are currently exempt from PDR.

<sup>&</sup>lt;sup>17</sup> See for example Article 4 Directions brought forward by the London Boroughs of Islington and Hackney

<sup>&</sup>lt;sup>18</sup> Note that this list is not exhaustive and boroughs are encouraged to draw on other local evidence as appropriate

<sup>&</sup>lt;sup>19</sup> Office floorspace in the CAZ is estimated to be around 18 million sqm (source: EGi London Offices Database/Ramidus Consulting, 2015)

 $<sup>^{20}</sup>$  Ramidus Consulting (2015) op cit; Jones Lang LaSalle. Permitted development rights for change of use from office to residential. (GLA, 2013); Jones Lang LaSalle. Potential impact of use classes order relaxation for change of use from offices to housing on City office stock. (City Corporation, 2011)

- 1.3.2 Although the office development pipeline in the short to medium term is currently sufficient to support demand for new provision, research and strategic monitoring suggests that there is a tightening of supply relative to demand in central London with availability rates of 3% and 5% in the West End and City respectively<sup>21</sup>. There is concern that sustained loss of offices, including the generally more affordable existing office stock, could erode the strategic offer of the CAZ as an internationally competitive and nationally important office location and undermine its associated agglomeration benefits. The London Office Review Panel and several local authorities in CAZ have expressed particular concern about this matter.
- 1.3.3 To implement London Plan policies 2.10 and 2.11 this SPG supports local policies and decisions that ensure agglomerations of offices and other CAZ strategic functions (see Table 1 in the Introduction) are not compromised by new residential development. Whilst the mixed use nature of the Zone is an essential part of its character, 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.
- 1.3.4 Residential communities play a valuable role in CAZ making it a liveable and human centre, and part of the attraction for businesses and visitors. Existing and potential new residents and communities in the CAZ contribute to the unique overall mix and vitality that characterises much of the Zone. However, a careful balance must be struck between the requirements and benefits of the varied strategic functions of the CAZ and the needs and sensitivities of local residents and communities.
- 1.3.5 Local Plans will play a key role in setting out detailed office policies for the CAZ and the appropriate balance between CAZ strategic functions (including offices) and residential in mixed use areas and in identifying locations or sites where residential development is appropriate.
- 1.3.6 When considering areas within CAZ that are appropriate for residential or mixed use development including residential it is important to strike a balance to ensure that business clusters and agglomerations in CAZ are not undermined. Particular regard should be taken to the individual and cumulative impact of new residential development and whether it could compromise the use and assembly of larger sites for business use owing to the long term tenure generally associated with residential ownership. Residential uses can also impact on neighbouring development sites and uses through the acquisition of residents' amenity rights, such as daylight, sunlight, overshadowing, overlooking and rights to peaceful enjoyment. This can place constraints on commerical development and operation including access and timing for deliveries and servicing of business uses.

<sup>&</sup>lt;sup>21</sup> Ramidus Consulting (2015) op cit, and London Plan Annual Monitoring Report 12 (Key Performance Indicator 8), GLA, 2016

1.3.7 Drawing on London Plan policy, Table 1.1 provides general guidance on the appropriate balance between offices and residential in different parts of the Zone. Residential development is considered inappropriate in the commercial core areas of the City of London and north of the Isle of Dogs, reflecting London Plan policy 2.11Aa, 4.3Aa and paragraph 4.17. Offices and other CAZ strategic functions should be given greater weight relative to new residential development in areas set out in section B of Table 1.1 reflecting the importance attached to CAZ strategic functions in London Plan policies 2.10 and 2.11. The Vauxhall Nine Elms Battersea, Elephant & Castle and Old Kent Road Opportunity Areas have potential to deliver greater levels of housing alongside employment than the other CAZ Opportunity Areas (London Plan Annex 1). In these areas offices and other CAZ strategic functions may be given equal weight relative to new residential development whilst ensuring that the employment capacity estimates for these areas in London Plan Annex 1 are realised. In the predominantly residential areas (London Plan policy 2.12), new residential development may also be given equal weight relative to CAZ strategic functions, with exceptions as set out in Table 1.1.

Table 1.1 Guidance on balancing the priorities attached to housing relative to offices and other strategic functions in CAZ and north of the Isle of Dogs:

PRIORITY/BALANCE	LOCATIONS
A: Residential development not appropriate	<ul> <li>Commercial core areas* of the City of London</li> <li>Commercial core* of the north of the Isle of Dogs</li> </ul>
B: Offices and other CAZ strategic functions should be given <b>greater weight</b> relative to new residential	<ul> <li>Other parts of City of London and north of the Isle of Dogs (outside core areas in A above)</li> <li>Core commercial areas in the City of Westminster including the West End/Soho/Covent Garden, Opportunity Areas and commercial parts of Marylebone and Fitzrovia</li> <li>Commercial core areas identified in the City Fringe/Tech City Opportunity Area Planning Framework</li> <li>All other CAZ Opportunity Areas and Intensification Areas (except Vauxhall, Nine Elms, Battersea; Elephant &amp; Castle; and Old Kent Road)</li> <li>Identified clusters of specialist CAZ strategic activities, Strategic Cultural Areas (SCA), CAZ Frontages and locally identified Special Policy Areas (SPA)</li> <li>All other parts of CAZ except those stated in C below.</li> </ul>
C: Offices and other CAZ strategic functions may be given <b>equal weight</b> relative to new residential	<ul> <li>Other parts of CAZ not covered in A or B above including:</li> <li>Vauxhall, Nine Elms, Battersea Opportunity Area</li> <li>Elephant &amp; Castle Opportunity Area</li> <li>Old Kent Road Opportunity Area (parts lying within CAZ)</li> <li>Predominantly residential neighbourhoods, areas or wholly residential streets (with exceptions in appropriate circumstances – for example clusters of specialist CAZ strategic activities, SCAs SPAs and CAZ Frontages)</li> </ul>

<sup>\*</sup> to be defined locally

# Implementation of London Plan Policy on office to residential conversions in CAZ

- 1.3.8 In response to concerns about the loss of office stock to residential in CAZ, London Plan Policy 4.3Bd requires residential proposals in CAZ which would otherwise result in the loss of office space to make a proportionate contribution to the provision of new office space within, or nearby, the development.
- 1.3.9 Local application of Policy 4.3Bd in Local Plans should be based upon robust, up to date and integrated strategic<sup>22</sup> and local assessments demand and supply.
- 1.3.10 When drafting local policies and considering planning applications that involve the loss of office floorspace in CAZ and/or change of use to residential the following factors should be taken into account:
  - a) Whether the office building is suitable for long-term viable office use
  - b) Whether there is viable long-term demand for the type of office floorspace affected (having regard to depreciation and potential alternative office uses/activities)
  - c) Whether redevelopment and re-provision of office space would be viable
  - d) Whether there are strong economic reasons why the loss of office floorspace would be inappropriate such as where the proposal would individually or cumulatively<sup>23</sup>
    - i) undermine or threaten the primary business function of the CAZ as a whole or a locally defined market within it
    - ii) reduce or prejudice the potential to assemble and deliver office development, including multi-let space for smaller occupiers and, where appropriate, larger floorplates
  - e) Whether the introduction of residential uses would have an adverse impact on the existing mix and function of CAZ strategic activities.
- 1.3.11 Viability in this context relates to whether the offices are likely to attract occupiers and still provide a reasonable return. Demand, viability and marketing evidence should be provided where proposals will result in the loss of office floorspace in CAZ unless this is part of an agreed swap/credit (see paragraphs 1.4.16 1.4.20). An example of good practice with regard to viability and marketing evidence is provided in figure 1.1 drawing on work by the City of London and the Mayor's Housing SPG.
- 1.3.12 Viability and marketing evidence should be weighed against other policies in the NPPF, London Plan and Local Plans and in the case of new residential development in CAZ a precautionary stance should be taken with particular

<sup>&</sup>lt;sup>22</sup> Ramidus Consulting. Small Offices and Mixed Use in London's Central Activities Zone. GLA, July 2015

<sup>&</sup>lt;sup>23</sup> taking into account permissions in the planning pipeline

weight given to the need to ensure that the CAZ strategic functions are not compromised. On sites where the loss of office use is considered acceptable having been justified against criteria such as that detailed above, the proposed mix of uses should prioritise inclusion of any other relevant CAZ strategic functions ahead of residential use or other non-strategic functions.

# Figure 1.1 Viability and Marketing Evidence

- a) Site specific information about the building;
- b) The total costs of maintaining the building both now and in the future;
- c) The costs and practicalities of refurbishing or redeveloping the building for office use:
- d) Information on rents and capital values;
- e) Information on current and recent levels of occupation;
- f) Target rates of return (internal rate of return or other appropriate measure);
- g) Evidence of the marketing of the building for continued office use having regard to the use, condition, quality and location of the building. Information should be provided setting out:
- h) the length of time the property/site has been marketed;
- i) the number and details of enquiries received, such as the number of viewings, the proposed uses and comments from prospective purchasers or tenants (including as to the suitability of continued office use).
- i) A valuation of the building\*
- k) Sensitivity testing to support the robustness of the report conclusions.

\*Generally an existing use plus basis is most appropriate for planning purposes.

However other approaches may sometimes be justified in light of local circumstances.

Sources: City of London. Office Use. Supplementary Planning Document. 15th and \* See Mayor of London Housing SPG

# 1.4 Offices and mixed use development – guidance on sensitive approaches to mixed use development

- 1.4.1 As a general principle mixed use development can deliver many positive outcomes. It contributes to accommodating future growth, makes efficient use of land and promotes attractive, successful and vibrant places with a range of activities used through the day and evening increasing safety and security. It can also reduce commuting and the need to travel for some journeys, thereby helping to reduce congestion and air pollution.
- 1.4.2 The London Plan provides a focused approach to securing mixed use development and housing within the CAZ and the north Isle of Dogs Opportunity Area. This is set out in Policy 4.3 of the London Plan, which is complemented by

- Policy 2.11Aa. Guidance provided in this section should be read alongside these policies, together with those on offices (Policy 4.2), the CAZ (Policies 2.10-2.12), and the Mayor's Housing SPG and Town Centres SPG.
- 1.4.3 The London Plan approach to providing mixed use development in the CAZ and north of the Isle of Dogs reflects the role office and residential uses and values can play in developing and sustaining mixed use neighbourhoods. However, whilst high office values in some central areas provide scope to support a mix of uses and contribute towards meeting London's housing need, increasing residential values within the CAZ are leading to pressures on existing office floorspace<sup>24</sup>.
- 1.4.4 Cumulatively, the loss of office stock within the CAZ to residential development has the potential to undermine the strategic functions of the CAZ and its offer as a competitive national and global business location.
- 1.4.5 Given concerns about achieving the right balance between strategic uses (including offices) and residential in the CAZ (see section 1.3 above), there needs to be a sensitive approach to application of mixed use development in the Zone. This is to ensure that the mix of uses support the CAZ strategic functions, incentivise redevelopment and renewal of the office stock, maintain an appropriate balance between offices and residential use, encourage active ground floor frontages where appropriate and support a mix of uses that contributes to the unique character of the CAZ including culture, leisure and tourism uses, retail and food/drink.

# Setting local floorspace thresholds for application of mixed use policy 4.3Aa

- 1.4.6 The application of London Plan policy 4.3Aa should ensure that there is an incentive to develop new or refurbished office space, whilst securing a proportionate contribution to the delivery of housing. When setting local thresholds for increases in office floorspace (above which the policy requirement to provide housing applies), boroughs should consider raising the threshold to a level which actively encourages office provision and renewal whilst still contributing towards housing provision and the delivery of mixed uses as appropriate and in accordance with Table 1.1. Local thresholds can be based on an absolute level of office floorspace and/or on the basis of a percentage of the existing office or total floorspace<sup>25</sup>.
- 1.4.7 In the absence of a local mixed use policy threshold, it is suggested that the default threshold for CAZ in Policy 4.3Aa should be 500 sqm (gross internal area) or 30 per cent of existing office floorspace – whichever is the greater. This is to ensure that there is a strong incentive for new office development and renewal, particularly where the marginal change in office floorspace is modest.

<sup>25</sup> See Ramidus (2015) op cit, section 7.5 and Appendix 4

<sup>&</sup>lt;sup>24</sup> Ramidus Consulting (2015) op cit

1.4.8 As a general principle, if an office development exceeds the local or default CAZ threshold, only the floorspace above the threshold should be used as the basis for assessing the appropriate amount of residential floorspace required.

# Delivering mixed uses and housing on-site or nearby and 'exceptions' to mixed use policy

- 1.4.9 Where housing and other mixed uses are required under Policy 4.3Aa, these should normally be provided either on-site or nearby in order to create mixed use neighbourhoods, unless this would compromise other policies in the Plan.
- 1.4.10 At a strategic level, the City and the commercial core of the north of the Isle of Dogs should continue to be promoted as clusters of globally-orientated financial and business services. As such these clusters are exempt from the principle to provide on-site housing as part of London Plan mixed use policy 4.3Aa. Elsewhere in CAZ, the implementation of mixed use development should reflect the relative weight accorded to the CAZ strategic functions relative to residential in London Plan policies 2.10 and 2.11 and this SPG (Table 1.1). This should ensure that the residential components of mixed use schemes do not compromise strategic functions within or nearby the development.
- 1.4.11 Whilst the London Plan does not define 'nearby' for the purposes of applying mixed use policies, this should be set locally and guided by the particular characteristics of a site or neighbourhood, which will vary considerably from scheme to scheme.
- 1.4.12 When considering such proposals in the CAZ, a flexible approach should ensure an appropriate balance between offices and residential in an area. Accordingly on-site provision of housing within CAZ should be proportionate, (having regard to the function of the locality and broader mix of uses in the area) and not necessarily an equivalent amount (reflecting the greater emphasis placed on CAZ strategic functions in this SPG).
- 1.4.13 The Plan recognises the need for sufficient flexibility in applying requirements for housing or mixed uses on-site or nearby a development in order to take account of other strategic and local policy objectives (eg. affordable housing provision and offices), alongside particular local circumstances, site constraints and management considerations. This flexibility can be supported by the use of land use 'swaps' and 'credits.'

## Land use swaps and credits

1.4.14 A land use swap is where a developer provides an off-site residential development to satisfy the housing requirement generated by a specified office/commercial development. The planning applications for the two sites are considered at the same time by the planning authority and are linked by a Section 106 agreement or planning condition. Another example of a land use swap is where a policy requirement for a specific use is provided on another site.

- 1.4.15 A land use credit is where new off-site residential provision is provided in advance by a developer on the basis that it could be drawn down to satisfy the residential requirements of mixed use policies generated by future commercial development. An affordable housing credit is where new affordable housing is created where it is not a policy requirement. This affordable housing credit could potentially then be drawn down either for the purposes of affordable housing policy requirements and/ or for the purposes of mixed use policy requirements.<sup>26</sup>
- 1.4.16 Policy 4.3Bb requires boroughs to develop local approaches to mixed use development and office provision, taking into account the contribution that land use swaps, housing credits and off- site contributions can make, particularly to sustain important clusters of commercial activities in the City and north of the Isle of Dogs. The Plan recognises there may be circumstances where a greater quantity or quality of housing provision (especially affordable housing and affordable family housing) can be secured in locations beyond the confines of a development proposal and its nearby area<sup>27</sup>.
- 1.4.17 In relation to the CAZ, the London Plan suggests mixed use policies should be applied flexibly on a local basis so as not to compromise its strategic functions<sup>28</sup>. The Plan suggests swaps or credits may be used within and beyond the CAZ<sup>29</sup>. It supports the coordinated application of mixed use policies across local authority boundaries where this would support the broader objectives of the Plan<sup>30</sup>.
- 1.4.18 An illustration of the operation of swaps and credits is provided in Figure 1.2.

  Research by Ramidus Consulting<sup>31</sup> provided other recent examples in Camden.

  Whilst swaps and credits can be a useful means of securing mixed use area objectives, they are by no means a universal solution.

## Negotiating affordable housing provision through Policy 4.3

1.4.19 Residential units proposed either on or off-site to address the requirements of Policy 4.3Aa will be subject to London Plan and Local Plan policies on affordable housing. The maximum reasonable amount of affordable housing should be sought from residential and mixed use schemes, taking account of the criteria set out in Policy 3.12 of the Plan. Further guidance on the application of this policy is provided in Section 4 of this SPG.

<sup>&</sup>lt;sup>26</sup> Mayor of London, London Plan 2015, glossary page 393-394

<sup>&</sup>lt;sup>27</sup> London Plan 2015, paragraph 3.74, final bullet

<sup>&</sup>lt;sup>28</sup> Mayor of London, London Plan 2015, paragraph 2.45

<sup>&</sup>lt;sup>29</sup> Mayor of London, London Plan 2015, paragraph 2.45

<sup>&</sup>lt;sup>30</sup> Mayor of London, London Plan 2015, paragraph 4.15

<sup>&</sup>lt;sup>31</sup> Ramidus 2015 op cit, sections 7.3 and 7.4.

# Figure 1.2 Example of land use swaps/credit in Westminster

Central Activities Zone

and construction of a new building over two basement part of ground floor, with offices on all the upper floors together with loading bay, other associated works and Permission granted for demolition of existing building Site 1 - Selborne House, 54 - 60 Victoria Street, SW1 levels, ground and 12 upper floors comprising retail flexible office or retail space (Classes B1/A1/A3) on (Classes A1/A3) at basement and ground floor and environmental improvements.

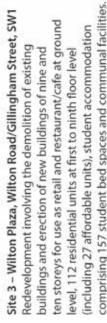
Resolution included:

- \* the provision of 59 residential units at Site 2;
- \* the provision of 250m2 Class A floorspace at Site 2;
- 1,075m2 of private residential credit from the Wilton \* the provision of 25 affordable housing units and Plaza scheme Site 3.

Demolition of existing building and construction of a new Site 2 - Wellington House, 67-73 Buckingham Gate, SW1 basement level, retail (Class A1) and residential entrance at ground floor level and 59 residential units at all upper building over basement, ground and 9 upper floors comprising car parking, cycle spaces and plant at floors and a terrace at roof level.

Resolution included:

\* the provision of 25 affordable housing units from the Wilton Plaza scheme Site 3.











- 1.4.20 Policy 3.12C of the London Plan states affordable housing provision should normally be provided on- site. This principle should be applied to affordable housing provision secured through Policy 4.3 of the London Plan, where on- site affordable housing provision is secured either: (a) through a swap or credit; or (b) where there is scope to accommodate housing on-site within a mixed use development.
- 1.4.21 Cash in lieu payments for off-site affordable housing should only be accepted where there would be demonstrable benefits in terms of furthering affordable housing provision and other policies in the London Plan (including sustaining the agglomerations of London's globally competitive financial and business services in the City of London and north of the Isle of Dogs). They should be accepted only where neither:
  - a) on-site provision through a mixed use development; or
  - b) on-site provision as part of a land use swap or credit is appropriate.

    Where off-site financial contributions are considered appropriate, this should be secured as part of a planning agreement and the maximum reasonable amount of funding for affordable housing should be sought based on a viability appraisal.
- 1.4.22 Requirements placed on office developments through Policy 4.3 should be informed by viability appraisal to ensure the scale of requirements for housing, affordable housing and other mixed uses does not threaten the ability for strategic office development to be viably developed, as specified by national policy and guidance<sup>32</sup>. Where a land use swap is being considered, it is important to consider the viability of the two schemes collectively, as this may affect the maximum reasonable amount of affordable housing delivery which should be sought.

## 1.5 Application and implementation of London Plan small office policy

- 1.5.1 During the London Plan Further Alterations Examination in Public, concerns were raised over the loss of smaller scale offices in CAZ and the impact that this might have on business requirements and the role of small offices as part of vibrant mixed use localities<sup>33</sup>. Policy 4.3Bc of the London Plan states that local policies within the CAZ which protect small-scale offices or require the re-provision of office floorspace should be justified on the basis of local and strategic evidence of office demand and supply. They should be focused on specific locations where there is a particular need for local office provision.
- 1.5.2 Recent research estimates that there are about 90,000 small office occupiers in the CAZ in units less than 500 sqm, of which over 80 per cent are in units of less than 100 sqm<sup>34</sup>. Occupier demand for small units in CAZ has been fuelled by

<sup>&</sup>lt;sup>32</sup> DCLG, NPPF, paragraph 173 and relevant sections of the PPG on viability.

<sup>&</sup>lt;sup>33</sup> Including evidence submitted by the London Office Review Panel, Mayor of London and several central London boroughs

<sup>&</sup>lt;sup>34</sup> Ramidus Consulting 2015 op cit, based on EGi. London Offices Database. See also Centre for Cities. Size Matters: the Importance of Small Firms In London's Economy. 2012.

growth in small and medium sized enterprises over the period 2010-2014 (and in particular firms in the 0-4 employee size band)<sup>35</sup>as well as larger corporate firms taking-up space in smaller units. The London Office Review Panel (LORP) notes that there is evidence that developers are looking to incorporate space for start-ups and smaller scale occupiers to bring vibrancy and energy to mixed use/commercial schemes<sup>36</sup>. Businesses requiring less than 100 sqm normally occupy space on flexible terms either in serviced offices or in different forms of flexible workspace (including co-working space) and there is evidence that these markets are expanding in response to occupier demand<sup>37</sup>. Although heritage buildings within the CAZ support many small office occupiers (and provide some protection of small office units to some degree), a large and growing proportion of small units are accommodated in larger multi-let buildings<sup>38</sup>.

1.5.3 Figure 1.3 illustrates that the clusters of small units within CAZ are dynamic. Between 1995 and 2000 the West End cluster spread north and west. By 2010 the cluster around Tech City had spread and the South Bank had intensified in strength. Between 2010 and 2015 the number of small units continued to expand in Clerkenwell, Tech City and the South Bank, whilst they declined in Mayfair, St James's and Covent Garden/St.Giles<sup>39</sup>.

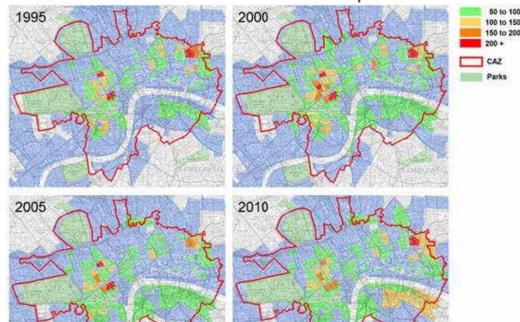


Figure 1.3 Number of small office units less than 500 sgm 1995-2010

Source: EGi London Offices Database/Ramidus Consulting

<sup>35</sup> See GLA Economics, 2015 op cit

<sup>&</sup>lt;sup>36</sup> London Office Review Panel 2015

<sup>&</sup>lt;sup>37</sup> URS and Gort Scott, 2014 op cit. and Ramidus Consulting. Serviced offices and agile occupiers in the City of London. City of London Corporation, 2014.

<sup>&</sup>lt;sup>38</sup> Ramidus Consulting 2015 calculated an average of 2.6 occupational units per building in CAZ (excluding units less than 100 sgm and serviced office centres)

<sup>&</sup>lt;sup>39</sup> Ramidus Consulting 2015 op cit

- 1.5.4 Whilst there has been significant change over the past 20 years, the CAZ has been able to accommodate growth in small units over this period and, in the current market, there is no need for CAZ wide policies specifically to protect small office buildings<sup>40</sup>. To implement London Plan policy 4.3Bc, local policies and planning decisions should promote and facilitate the provision of small office units in CAZ (including workshops, studios and small office units within larger developments) in response to occupier demand.
- 1.5.5 By striking an appropriate balance between offices and residential and affording greater protection for employment uses from changes to residential within CAZ (see Section 1.3) and its fringe (see section 6.6), local policies should ensure that suitable provision in terms of size, cost, location and environment is made for small office occupiers.
- 1.5.6 From an affordability perspective, Ramidus concluded that while some businesses that have been long-established in fringe locations will face unsustainable rental increases at rent review, the CAZ is currently offering an acceptable range of rental values) and it has the capacity to absorb small occupiers. However, while there is a range of companies who do offer affordable space, there is evidence of significant cost increases in parts of the CAZ which is forcing affordable



space to the CAZ Fringe and beyond.<sup>41</sup> Locations within and outside the CAZ, including parts of the City Fringe and Tech City for example, will play an important role in providing affordable space for new business start ups and small and medium-sized enterprises.

1.5.7 To support local policy development for small offices and implementation of London Plan policy 4.3Bc to ensure an adequate supply and affordability of small offices in CAZ, the following series of benchmarks/thresholds should be monitored jointly by the GLA/ CAZ boroughs<sup>42</sup>:

<sup>&</sup>lt;sup>40</sup> Ramidus 2015 op cit

<sup>&</sup>lt;sup>41</sup> CBRE Creative London, 2015

<sup>&</sup>lt;sup>42</sup> Ramidus 2015 op cit

Benchmark 1: Small office units (less than 500 sq.m) as a proportion of the total CAZ office stock

The stock of small offices (less than 500 sqm and including serviced office space) should be at least 14 to 17 per cent of the total CAZ office stock.

Benchmark 1 measures the relationship between small office space and total office space in CAZ. Small offices, by unit of occupation, have typically comprised 14 to 15 per cent of all CAZ office stock over the period 1995 to 2015. In addition serviced offices currently comprise a further 3 per cent. If the stock of small offices (less than 500 sq.m and including serviced office space) falls below the range of 14 to 17 per cent of the total CAZ office stock, this could be taken as a signal of potential constraint in supply.

Benchmark 2: Availability of small offices (less than 500 sq.m) When the availability of small offices falls below 14 per cent of total availability, particularly close attention should be paid to other market indicators, and the level of supply should be reviewed.

The extent to which small offices are being marketed indicates the level of choice available to small occupiers. In London Office Policy Reviews an 8 per cent availability rate is a pivotal measure for the London office market as a whole. If the availability of small offices falls below 14 per cent of total availability, this could be taken as a signal of a potential supply issue. Availability should be monitored by unit size where feasible and include the flexible space market.

Benchmark 3: Rent levels of small offices (less than 500 sq.m) In seeking to promote worthwhile choice for small office occupiers, planning policy should seek to ensure that small office development occurs in a range of established office locations which have good public transport, such that small office space should be available in non-prime locations at no more than 50% of prime rents in Central London.

Benchmark 3 is designed to monitor the broad variation in cost to small office occupiers at a comparable specification – in this case for the best quality space. If the average is at 50 per cent or less of prevailing prime rents then it could be considered that adequate choice is available.

# 1.6 Supporting specialist clusters

- 1.6.1 London contains several important, fast-growing specialist clusters of activity which contribute towards the capital's high level of productivity and global reputation. In the dynamic CAZ environment, many of these clusters have developed organically over time and this process is continually evolving. Clustering and agglomeration offers businesses several benefits, including knowledge, innovation and technology transfer between business and sectors, fostering collaboration, attracting and retaining skilled labour, and competition which drives efficiency and global competitiveness.
- 1.6.2 In recent years, London has witnessed strong growth in areas such as tech, digital,

media, communications, creative industries and life sciences, adding to its existing strengths in the business, professional and financial services sector, arts and culture, health, education and law (see annotated CAZ Diagram in Section 6). A supportive policy approach to the wide variety of space requirements and conditions is essential to enable these sectors to flourish and fulfil their economic potential. Considerations to support these clusters include the availability of suitable, adaptable, flexible and competitively priced accommodation responding to the needs of different sectors, small and medium sized enterprises as well as larger employers, start-ups as well as established and growing

businesses.

1.6.3 To support the diversity and dynamism of the CAZ a range of property types and requirements will need to be met. This includes provision for large floorplate offices, flexible and hybrid<sup>43</sup> workspace, small offices, including small units within larger office buildings, serviced offices, incubator and accelerator space, coworking space/hubs and, where there is local evidence of need, affordable space including laboratory, research and development space may be necessary to support the development of health, life sciences and bio-tech clusters of activity. The potential for collaboration between businesses and higher education institutions should be explored as well as linkages between universities and teaching hospitals.



1.6.4 The evolution of clusters and place City Fringe making will also be supported by connectivity (transport and digital<sup>44</sup>), opportunities for collaboration and networking, mix of uses, character (sense of place) and quality of the urban environment. Further spatial guidance on specialist clusters in the CAZ is provided in section 6.2.

### 1.7 **Business Improvement Districts**

1.7.1 Several areas within the CAZ (and parts of its fringe) benefit from having Business Improvement Districts (BIDs) illustrated in Figure 1.4. The Mayor strongly endorses the concept of Business Improvement Districts (BIDs) which are precisely defined

<sup>&</sup>lt;sup>43</sup> In a CAZ context, hybrid space refers to flexible office/research and development/light industrial space.

<sup>&</sup>lt;sup>44</sup> See section 5.7 of this SPG

geographical areas within which the businesses/ ratepayers have voted to invest collectively in local improvements to place shaping, promoting safety, security and environmental quality. BIDs are supported in the London Plan (Policies 2.7Af and 2.15Dd) in recognition of their value in the management of London's centres. BIDs have the capacity to innovate, enhance and improve their local area and are demonstrating that they can balance private-sector credentials with effective relationships with their host borough<sup>45</sup>.

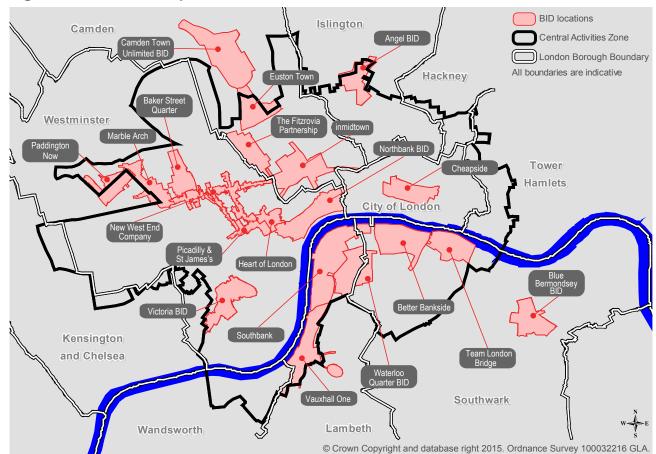


Figure 1.4 Business Improvement Districts in and around the CAZ

## 1.7.2 Business Improvement Districts can foster innovative partnership working to:

- stimulate investment / improvements in the designated area (eg the Lowline project in Lambeth/Southwark) which aims to reuse and enhance railway viaduct arches and associated public realm to enliven the area's shopping, entertainment and employment offer and improve the walking and cycling environment
- engage with local communities in addressing local needs and/or enabling local businesses to do so (for example a community forum to tackle social needs in Westminster by the New West End Company)
- improve communications and connectivity (eg Better Bankside raising awareness of major infrastructure projects affecting the area; In Midtown

<sup>&</sup>lt;sup>45</sup> Future of London and Rocket Science. Research for the GLA/LEP, 2016

- building a secure cycle vault with showers, lockers and maintenance)
- tackle specific issues (such as the New West End Company tackling smash and grab robberies in the West End and Victoria BID adopting an innovative model to foster a safe and secure environment)
- deliver cost effectiveness and money-saving benefits for businesses (for example Paddington BID which introduced a commercial recycling scheme)
- increase the visibility, stature and overall identity of an area (for example Camden Town Unlimited with its 'pop-up' shops initiative)
- support the curation and delivery of festivities and events within BIDs to increase engagement and provide high quality animations and cultural projects (for example Piccadilly Circus in the Mayor's Summer Like No Other in 2012).
- 1.7.3 Currently, property owners can make voluntary contributions towards a ratepayer Business Improvement District. As a result of CLG 's consultation in 2014 the Government introduced legislation for the establishment of Property BIDs. This is a special type of BID where, subject to a ballot, all property owners within the BID area are required to make contributions in addition to the businesses/ ratepayers. The Heart of London and Piccadilly and St James were the first two property BIDs to be established in the UK. A property BID can be set up if:
  - it is in the same geographical area as a Business Rate Supplement and a ratepayer Business Improvement District; and
  - it imposes the levy only for periods falling within the period that the ratepayer Business Improvement District arrangements are in operation.
- 1.7.4 The BIDs programme has been embedded in the work of the London Enterprise Panel (LEP)<sup>46</sup> and GLA guidance on how to set up, develop and manage BIDs is available on the GLA website<sup>47</sup>. The Cross River Partnership<sup>48</sup> brings together several of the central London BIDs on a regular basis to share experience and delivers a range of regeneration programmes in Central London.
- 1.8 Co-ordinating the management of industrial capacity to meet the distinct needs of the CAZ.
- 1.8.1 A key concern of the London Plan (policies 2.17 and 4.4) is to ensure that there is sufficient capacity to meet the needs of industrial and related uses including logistics, waste management and land for transport uses that are essential to sustain the city's metabolism, including 'services for the service sector'. These uses play an important role in supporting the strategic and local functions of the CAZ.
- 1.8.2 In the high value land market within the CAZ there is very limited industrial capacity. Differentials between industrial and non- industrial land values in the CAZ boroughs puts immense pressure on sites in industrial use for conversion to non-industrial uses.

40 https://lep.lond

<sup>46</sup> https://lep.london/

<sup>&</sup>lt;sup>47</sup> https://www.london.gov.uk/priorities/business- economy/vision-and-strategy/focus-areas/ business-improvement-districts/tools-for-bids

<sup>&</sup>lt;sup>48</sup> A public-private partnership that has been delivering regeneration projects in London since 1994

- 1.8.3 Results from the London Industrial Land Baseline<sup>49</sup> estimate that 157 hectares of industrial land were transferred to non-industrial use in the ten CAZ boroughs over the period 2010-2015. This total is already in excess of the 132 hectare monitoring benchmark<sup>50</sup> (2011-2031) for industrial land transfer in the ten CAZ boroughs.
- 1.8.4 In local plans, boroughs (particularly but not exclusively those in Inner London) are encouraged to take into account the supply and demand for industrial and related uses providing essential services to the CAZ, in particular sustainable distribution/ logistics; 'just-in-time' servicing (such as food service activities, printing, administrative and support services, office supplies, repair/maintenance); waste management and recycling; and land to support transport functions. Account should also be taken of London Plan Map 4.1 (borough level groupings for industrial land transfer) and other relevant policies including policy 2.13 Opportunity Areas and Intensification Areas.
- 1.8.5 Employment land reviews will play an important role in providing this evidence and should investigate:
  - a) the range, scale and quality of industrial and related activities and the extent to which these directly or indirectly support the functions of the CAZ and where these are located
  - b) evidence of vacancy, availability, take-up and development pipeline for industrial uses
  - c) rental/land value trends for industrial uses serving the CAZ, compared to a range of non- industrial uses including offices, retail and residential
  - d) future demands for industrial and related activities to support the functions of the CAZ including hybrid office/industrial workspace
  - e) whether the industrial and related activities serving the CAZ could potentially take place in the context of higher intensity redevelopment providing functional efficiency, employment growth and new housing
  - f) the extent to which activities that directly or indirectly support CAZ functions could operate effectively from alternative more remote sites and the potential impacts this might have (for example on the overall function of the CAZ, transport infrastructure and congestion).
- 1.8.6 Having regard to London Plan (policy 4.4 and paragraphs 4.18- 4.24), the Mayor's Land for Industry and Transport SPG and the criteria in paragraph 1.8.5 above, boroughs are encouraged to consider whether industrial sites would merit policy designation in Local Plans as 'Locally Significant Industrial Sites' to ensure that capacity is sustained to support the efficient functioning of the CAZ.

<sup>&</sup>lt;sup>49</sup> AECOM/DTZ. London's Industrial Land Baseline 2015. GLA, 2016

<sup>&</sup>lt;sup>50</sup> Mayor of London. Land for Industry and Transport SPG. GLA, 2012



# **SECTION 2:**

# MANAGING THE ATTRACTIONS OF THE CAZ AS A GLOBAL RETAIL, CULTURAL AND VISITOR DESTINATION

### 2.1 Introduction

2.1.1 This part of the SPG provides guidance on managing the attractions of CAZ as a global retail and visitor destination and promoting strategic clusters of culture, arts and entertainment uses/activities. Guidance is provided on how boroughs should sensitively manage potential pressures on cultural venues within the CAZ and identify and manage clusters of evening and night time activities. Additional guidance is provided on creative industries, hotels and clarifies the London Plan approach to retail development within the Zone.

# 2.2 Promoting culture, arts and entertainment

2.2.1 Arts, cultural, tourism and entertainment activities are integral to the function and distinctive character of the CAZ and its mix of daytime, evening and night time uses. They make a vital contribution to London's world city offer, helping to ensure the capital is an attractive place to visit, live, work and invest. The CAZ contains

a substantial proportion of London's cultural infrastructure, including significant numbers of museums, theatres, concert halls, galleries, live music venues, libraries and other performance spaces, some of which are of national and global importance. This is supported by a variety of smaller venues which play an equally significant role, helping to widen the variety and richness of London's



Piccadilly Circus Circus

overall cultural offer and support the development of emerging artists. Promoting and sustaining central London's unique and diverse cultural environment within the CAZ is considered to be a strategic priority which should be reflected in planning policies and decisions.

# The role and importance of cultural uses within the CAZ

2.2.2 Research shows that London's cultural offer is especially strong in comparison to other world cities<sup>51</sup>, with the number and variety of cultural venues especially concentrated within the CAZ<sup>52</sup>. These attractions and their heritage value are critically important in maintaining London's position as a world city for culture and its appeal as a global visitor destination. Cultural tourism also makes a significant contribution to London's economy. GLA research<sup>53</sup> estimates that tourism attributable to cultural activities and services helped to support 80,000 jobs, £7.3 billion in expenditure and £3.2 billion in gross value added (GVA)<sup>54</sup> during 2013.

<sup>&</sup>lt;sup>51</sup> Mayor of London, World Cities Culture Report, 2013, GLA; Mayor of London, Cultural Metropolis the Mayor's cultural strategy – 2012 and beyond, 2012, GLA

<sup>52</sup> Mayor of London, Town Centres Supplementary Planning Guidance, 2014, GLA, Figure 1.1

<sup>&</sup>lt;sup>53</sup> GLA Economics, the Value of Cultural Tourism to London, 2015, GLA Gross Value Added measures the contribution to the economy of each individual producer, industry or sector. More simply put, it is the value added generated from activity in the economy.

<sup>&</sup>lt;sup>54</sup> Gross Value Added measures the contribution to the economy of each individual producer, industry or

2.2.3 Similarly, the number and range of cultural attractions within the CAZ also helps to secure London's status as a world leading city in terms of economic growth, job creation and investment<sup>55</sup>. Research shows that, at both a national and global scale, businesses who are reliant on highly skilled workers tend to cluster in locations which offer employees proximity to cultural and leisure amenities<sup>56</sup>. The agglomeration of similar companies and workers in the same area provides productivity benefits for businesses through access to a large talent pool and potential customers and through the sharing of ideas and resources.

### Managing the cultural attractions of CAZ as a global visitor destination

- 2.2.4 The London Plan identifies a number of strategic clusters of cultural, entertainment and visitor attractions. These are shown on Map 4.2 of the London Plan and/or on the CAZ diagram and include:
  - the West End, covering 'theatreland', Leicester Square, Oxford Street, Regent Street, Bond Street;
  - areas around Soho, Covent Garden, Piccadilly, Haymarket, and Shaftsbury Avenue;
  - Palaces and Parks, including Buckingham Palace, Green Park, St. James's Park, Regent's Park, Parliament Square, Hyde Park, and Kensington Palace and Gardens:
  - the South Bank, including areas around Bankside and London Bridge;
  - the North Bank, including Millbank, Tate Britain and Somerset House; areas of the City of London, including St Paul's, the Tower of London and the Barbican complex; and
  - Knightsbridge and South Kensington museum quarter<sup>57</sup>
- 2.2.5 Boroughs should identify, promote and protect the special cultural, tourism and heritage value of these major clusters in their Local Plans and seek to enhance the surrounding environment, in line with Policies 4.5Af and 2.11Af of the London Plan. Within the CAZ, it should also be recognised that substantial numbers of cultural assets also exist outside of these identified areas, which boroughs should manage,



promote and develop, for example, the emerging clusters of cultural activities and creative industries around Kings Cross Granary Square, Angel, Old Street and Shoreditch<sup>58</sup>. Mixed use development in opportunity areas including Vauxhall Nine Elms Battersea, Elephant and Castle and Kings Cross should support new cultural

sector. More simply put, it is the value added generated from activity in the economy.

 $<sup>^{55}</sup>$  Mayor of London, Cultural Metropolis - the Mayor's cultural strategy – 2012 and beyond, 2012, GLA

<sup>&</sup>lt;sup>56</sup> NLP, Workspace Futures, The changing dynamics of office locations, 2015

<sup>&</sup>lt;sup>57</sup> Mayor of London, London Plan 2015, GLA, page 163

<sup>58</sup> CBRE, Creative London, 2014

- attractions in line with Policies 4.6Cd and 4.6Cg of the London Plan and support the emergence of new clusters of cultural activities within the CAZ.
- 2.2.6 In preparing and applying planning policies which relate to cultural venues, boroughs should avoid defining cultural activities too narrowly in terms of more conventional cultural institutions (eg. theatres, galleries, museums and concert halls), but should also include dedicated live music, comedy and dance venues. Boroughs should also consider applying cultural policies to specifically identified pubs, restaurants or clubs which provide regular opportunities for creative and cultural performances, eg. fringe theatre, live music, or comedy, alongside primary uses. Whilst these activities may be less frequent and smaller in scale, they can be of a comparable cultural, social and heritage value to the character of particular areas of the CAZ and in terms of the development of emerging artists.
- 2.2.7 To inform local plans and planning decisions, boroughs should consider undertaking audits of cultural venues and activities in their areas, engaging with industry stakeholders and the local community. Boroughs should enhance and protect existing cultural venues and performance spaces in line with Policy 4.6Ca of the London Plan. This includes cultural venues which are identified through the neighbourhood planning process or registered as assets of community value (London Plan Policy 4.8Bc).
- 2.2.8 Boroughs are encouraged to designate and promote existing or emerging clusters of cultural activities and related uses as 'cultural quarters' in order to further develop the range of cultural attractions on offer within the CAZ and accommodate new arts, cultural and entertainment activities (London Plan Policy 4.6Cc). The Town Centres SPG provides further guidance on cultural quarters, which boroughs should draw on when preparing plans and frameworks<sup>59</sup>. Of particular relevance to the CAZ is the need for successful cultural quarters to:
  - provide an authentic cultural and visitor experience
  - encourage a mix of supporting daytime and evening uses including restaurants/ bars, pubs, music and performing arts venues, clubs as well as retail
  - encourage the supply of workspace suitable for creative industries
  - provide a stimulating, legible and high quality environment
  - enhance the economic vitality of the area and contribute to urban regeneration and economic development
  - optimise potential synergies between major creative or cultural clusters/ anchors, including related Higher Educational Institutions
  - draw positively on local heritage and townscape assets and where possible, include transitory and informal cultural activities, such as festivals and/or temporary performance and exhibition space.

### Managing potential pressures on cultural venues

2.2.9 Proximity to cultural and entertainment activities and central London's globally

<sup>&</sup>lt;sup>59</sup> Mayor of London, Town Centres Supplementary Planning Guidance, GLA, 2014, paragraphs 1.2.7-8

iconic core can mean that a number of strategic cultural areas in the CAZ are highly attractive locations for mixed use residential development. Whilst residential accommodation can enhance the mixed use character of a number of strategic cultural areas (for example along Southbank, Bankside and in the Barbican centre), it is important to manage residential development sensitively in CAZ to ensure that residential uses do not predominate or strategically constrain the varied mix of commercial, cultural, entertainment, leisure and evening activities in the area. In particular, there should be recognition that Covent Garden, Soho and the West End contain the country's largest concentration of evening activities and is defined in the London Plan as a night time economy cluster of international importance<sup>60</sup>. In this and other strategic clusters within the CAZ the location, layout and design of residential development should be complementary to cultural and evening activities and the mixed use character of the CAZ.

- 2.2.10 Increasing property values, development pressures and permitted development rights can mean cultural activities may be at risk of being squeezed out and replaced with higher value uses either through redevelopment or change of use. Analysis by the Mayor's Music Venues Taskforce<sup>61</sup> suggests that there has been a significant decline in the number of grassroots music venues in London, with 24 venues (including a number of pubs) having closed within the CAZ between 2007 and 2015. Only 51% of the grassroots music venues that traded in the CAZ between 2007 and 2015 remain open. In addition, a further five venues closed during the same period in Camden and Chalk Farm - which lies just outside the CAZ boundary but is an important cultural and tourist destination. Whilst there are a number of reasons for music venues and pubs closing, the planning system can provide more effective and practical support to help sustain these uses where they remain viable. This could include the consideration of tailored planning policies; working with local communities to consider the designation of Assets of Community Value; and the use of targeted Article 4 Directions, where appropriate and robustly justified.
- 2.2.11 Sustaining and protecting noise generating cultural venues such as theatres, concert halls and, in particular, live music venues requires a sensitive approach to manage change in the surrounding area. This should ensure adjacent development and land uses are brought forward and designed in ways which ensures that established cultural venues remain viable and can be continued in their present form,



without the prospect of neighbour complaints, licensing restrictions or the threat

<sup>60</sup> Mayor of London, London Plan, 2015, GLA, Map 4.3 & Table A2.1

<sup>&</sup>lt;sup>61</sup> Mayor of London, The Mayor of London's Music Venues Taskforce, London's Grassroots music venues – Rescue Plan, GLA, 2015

of closure. In justified circumstances, residential development proposed within the vicinity of an existing cultural venue should include necessary acoustic design measures to ensure residential units are provided with effective sound insulation in order to mitigate and minimise potential noise impacts or neighbour amenity issues. An important reason to incorporate mitigation measures within new residential development is to avoid established venues being subject to unreasonable restrictions, administrative burdens, costs or enforcement action as a result of changes in nearby land uses since venues were established – a key principle that is set out in the NPPF<sup>62</sup> and London Plan Policy 7.15Bb.

- 2.2.12 Where appropriate, mitigation measures should be explored at an early design stage, with necessary and appropriate provisions secured through planning obligations<sup>63</sup>. In line with the NPPG<sup>64</sup>, decisions should take into account the economic and social benefits being derived from the cultural activity associated with any noise impacts and ensure appropriate mitigation is secured so that businesses can be continued. It should be recognised that the Mayor's Housing SPG requires the impact of noise to be considered in the layout and placement of dwellings, rooms and private open spaces within new development<sup>65</sup>. Boroughs and developers should note that the Housing SPG confirms that enclosing balconies as glazed winter gardens can be considered an acceptable alternative to open balconies where dwellings may be exposed to noise.
- 2.2.13 London Plan Policy 4.6Cb supports boroughs in encouraging the temporary use of vacant buildings or land for arts and cultural exhibitions, live performances and creative work spaces. Temporary uses or activities can help sustain and enhance the character and vitality of an area, particularly on large, multi-phased development sites. However, such activities, being temporary in function, should not conflict with the longer term, planned regeneration and redevelopment of a site or area.

### Leisure uses and the evening economy

2.2.14 A diverse range of day-time and evening leisure uses including restaurants, cafes, pubs, bars, cinemas, and performing arts venues plays an important role in generating the vibrant and 'mixed' character of much of the CAZ and generates substantial numbers of jobs and expenditure<sup>66</sup>. The London Plan recognises that central London's evening economy makes an important contribution to London's world city offer, helping to sustain the capital's position as a major visitor destination. The range of evening attractions within the West End, especially around Soho and Covent Garden, is a particular magnet for visitors, as well as meeting Londoners' needs, which boroughs should recognise, manage and improve in line with policies 2.11Ae and 4.6.

<sup>&</sup>lt;sup>62</sup> DCLG, National Planning Policy Framework, 2012, paragraph 123, 3rd bullet point

<sup>63</sup> DCLG, National Planning Policy Framework, 2012, paragraph 123, 3rd bullet point

<sup>&</sup>lt;sup>64</sup> DCLG, National Planning Practice Guidance, Paragraph: 005 Reference ID: 30-005-20140306

<sup>&</sup>lt;sup>65</sup> Mayor of London, Housing Supplementary Planning Guidance, Standard 5.3.1, page 79, GLA, 2012

<sup>66</sup> GLA Economics Working Paper 47 - Spending Time 2011 update, Mayor of London, 2011

- 2.2.15 Boroughs should identify and manage strategic and local clusters of evening activities within the CAZ in order to address need, whilst seeking to minimise potential impacts on other land uses and taking into account any cumulative effects of particular concentrations of night time uses (Policy 4.6Cf). It should be recognised that addressing cumulative effects does not necessarily require boroughs to reduce or restrict evening uses within existing or emerging clusters. Sensitive management is, however, required to ensure that a balanced and complementary provision of day and evening uses is provided in order to sustain the social and economic strategic functions of the CAZ. This will require local planning and licensing approaches to be fully integrated. Further relevant guidance on London Plan Policy 4.6 is provided in the Town Centres SPG<sup>67</sup>.
- 2.2.16 To support a diverse evening economy, boroughs are also encouraged to promote a range of non-food/drink related evening activities, including cultural and entertainment uses and through later opening hours for retail and leisure uses. Boroughs may on a case by case basis also consider the need to distinguish particular late night uses from other evening uses, where the nature of these activities and hours of operation would necessitate more tailored management, taking into account location and context.
- 2.2.17 The CAZ contains a number of important clusters of leisure and evening uses including the country's largest concentration of evening activities in Soho/Covent Garden a strategic asset which should be managed and improved in line with Policy 2.10Ae of the London Plan together with other clusters of evening uses such as those in Shoreditch, Knightsbridge, Angel and Kings Cross. The West End as a whole is home to over 3,000 licensed premises, which includes a diverse range of evening activities. These play an important role in attracting approximately 200 million visitors a year to the West End<sup>68</sup>. Managing this concentration of evening uses poses unique challenges and opportunities, with some streets busier during the evening and night, than during the day<sup>68</sup>. The introduction of 24 hour tube provision on Friday and Saturday nights will have implications for how evening activities are managed and phased.
- 2.2.18 Sensitive management of evening uses within the CAZ should recognise the synergies between central London's attraction as a major cultural, visitor and retail destination and the range of supporting leisure uses<sup>69</sup>. It should also be recognised that, from an economic perspective, a range of day and evening amenities can be an important attractor for business and employees, especially within the creative sector, encouraging the clustering of creative businesses<sup>70</sup> (see paragraph 2.2.19). This trend can be observed around Soho, Old Street and London Bridge.

<sup>67</sup> West End Commission Final Report, 2013

<sup>68</sup> City of Westminster. The West End, 2015

<sup>69</sup> Mayor of London, London Plan, 2015, policies 4.5, 4.6, 4.7, 2.15

<sup>&</sup>lt;sup>70</sup> NLP, Workspace Futures, The changing ynamics of office locations, 2015

### **Creative industries**

- 2.2.19 London has established itself as a world leader for creative industries with particular strengths in advertising, architecture, fashion design, film/TV and music production, visual and performing arts, publishing, and digital technology based industries. A number of highly successful clusters of creative industries are found in the CAZ, including those at Soho/the West End and Tech-City/Silicon Roundabout, together with other important and emerging clusters around Farringdon, Kings Cross, London Bridge/Southbank and 'Mid-Town' (Holborn, Bloomsbury)<sup>71</sup>. As a whole, London's creative industries generate over £21billion turnover, helping to provide 697,000 jobs around one in every six jobs in the capital<sup>72</sup>. However, a combination of rising occupational costs and a growing shortage of suitable workspace, especially more affordable workspace, could be a significant constraint on future growth of this sector within the CAZ, which should be monitored and managed sensitively.
- 2.2.20 Boroughs should support and sustain existing and emerging clusters of creative industries within the CAZ, in line with policies 2.11, 4.6 and 4.11 of the London Plan. It should be recognised that the term 'creative industries' covers a broad and diverse range of sectors, which may require tailored local approaches to address the particular characteristics and uses found within different creative clusters. For example, where there is a defined need for visual and performing arts spaces within cultural quarters, boroughs should seek to enhance and protect creative workplaces and performances spaces (Policy 4.6Ca) and support the temporary use of vacant buildings for performance and creative work (Policy 4.6Cb). Promoting more office based clusters of creative industries within the CAZ will necessitate boroughs to follow a more focused approach on the type, size and affordability of office accommodation, including the provision of flexible and appropriately sized office floorspace suitable for a range of small and medium sized enterprises and start-up companies. In promoting creative industries within the CAZ, boroughs are encouraged to:
  - provide protection for existing small scale offices (under 500sqm or a justified local threshold), where this is justified by local and strategic evidence of supply and demand (Policy 4.3Bc).
  - require residential proposals which would result in the loss of office space, to make a proportionate contribution to the provision of new office space within, or nearby, the development (Policy 4.3Bd).
  - in justified circumstances, secure new SME work space (and where necessary affordable SME workspace) on large mixed use developments. Where appropriate, these should be secured through Section 106 agreements, taking into account viability and the Mayor's strategic priorities for planning obligations (Policy 8.2)<sup>73</sup>.

<sup>71</sup> CBRE, Creative London, 2014

<sup>&</sup>lt;sup>72</sup> Mayor of London, Cultural Metropolis – The Mayor's Culture Strategy – Achievements and next steps, GLA, 2014

<sup>&</sup>lt;sup>73</sup> Mayor of London, London Plan, GLA, 2015, paragraph 4.35

- sensitively manage the balance between residential and employment uses in appropriate parts of the CAZ to ensure, as a result of higher land values and redevelopment, that residential uses do not predominate or strategically constrain the provision of office floorspace in areas with a particular employment focus (Policies 2.10Ae, 4.2). This should take into account the supply and demand for employment floorspace and the potential for mixed use development to secure new office floorspace.
- 2.2.21 Research suggests that London's comparative advantages as a centre for creative industries in relation to other European rivals is to a large extent based on London's broad range of social and cultural attractions<sup>74</sup>. These play an important role in the clustering of creative industries and, overall, help to make London a highly desirable location for businesses and employees. Boroughs should consider how these attractors and a vibrant mix of day and evening uses can be managed positively within certain areas of the CAZ, for example strategic cultural areas or cultural quarters, taking into account other local and strategic planning considerations.

### 2.3 Tourism

2.3.1 At present, the capital is one of the most popular tourist destinations in the world, attracting around 17 million international visitors a year, together with a further 12 million domestic visitors<sup>75</sup>. Overall, these visitors generate around £14 billion in expenditure, helping to support a wide range of jobs, businesses and cultural and visitor attractions<sup>76</sup>.



Consequently, the provision of an adequate supply of visitor accommodation is of critical importance to London's future success as a global visitor destination, as is recognised in Policy 4.5 of the London Plan. In addition to this, GLA research<sup>77</sup> shows that London also receives nearly 300 million tourism day visitors a year, who contribute over £10 billion to London's economy in terms of spending. Over 40% of these day visits are concentrated in London's CAZ boroughs, which also account for around half of all spending. To sustain London's attraction as a hub for domestic and overseas visitors, boroughs should promote, enhance and protect major clusters of visitor attractions (Policy 4.5Af) and promote investment in the public realm and the wider cultural, heritage, business and retail offer of particular clusters.

<sup>&</sup>lt;sup>74</sup> CBRE, Creative London – Pushing the boundaries, CBRE Global Research, 2014

<sup>&</sup>lt;sup>75</sup> Mayor of London, A cultural tourism vision for London 2015 – 2017, GLA

<sup>76</sup> ibid

 $<sup>^{77}</sup>$  Great Britain Day Visitor Survey 2011 (note definition is wider than previous LDA survey). For further details see GLA Economics, Current Issues Note 38. The Great Britain Day Visitor Survey 2011  $^{-}$  a London analysis. GLA, 2012

- 2.3.2 Policy 4.5 of the London Plan requires boroughs to support the capital's visitor economy and improve the range and quality of hotel provision. To ensure there is sufficient hotel provision in London over the next 20 years, the London Plan sets out a strategic benchmark target for 40,000 net additional hotel bedrooms by 2036<sup>78</sup> (of which 10% should be wheelchair accessible). Whilst, it is unclear how changes to legislation on short- term lettings will impact anticipated demand for hotel provision in London, the Plan's strategic benchmark will be reviewed as part of the Full Review of the London Plan.
- 2.3.3 Policy 4.5 should be implemented in ways that ensure new hotel provision is located in accessible locations and avoid concentrations of hotel uses within parts of the CAZ that might constrain other important strategic activities and land uses (for example office and other commercial and leisure uses).
- 2.3.4 According to research by GLA Economics<sup>79</sup>, business tourism accounted for around 19% of visits and 26% of spend in 2010. Boroughs are encouraged to give consideration to addressing the requirements for business tourism in the CAZ. Hotel developments within or around the CAZ should support the provision of high quality conference facilities, where viable and appropriate (Policy 4.5Ad).
- 2.3.5 When considering potential impacts of new hotel development on the balance of local land uses, boroughs should consider whether additional hotel provision would:
  - negatively impact the availability of local employment and commercial floorspace in the area (taking into account demand and viability);
  - constrain the ability to meet conventional housing needs in a neighbourhood;
  - erode the mixed use / residential character of an area.
- 2.3.6 Improving the accessibility of hotel accommodation in London is a particular priority in the London Plan (Policies 4.5 and 7.2). Research by Grant Thornton<sup>80</sup> confirmed that many disabled people find it difficult to find suitable and affordable hotel accommodation in London, with only around half of current demand for accessible hotel bedrooms met and less than 2 per cent of existing stock accessible. Further guidance on the implementation of the London Plan's target for 10 per cent of new hotel provision to be wheelchair accessible is provided in the Town Centres SPG and Accessible London SPG.

<sup>&</sup>lt;sup>78</sup> GLA Economics, Understanding the demand for and supply of visitor accommodation in London to 2036, GLA, 2013

<sup>&</sup>lt;sup>79</sup> GLA Economics, Working Paper 53. Tourism in London GLA, 2012

<sup>80</sup> Grant Thornton et al, Accessible Hotels in London, GLA, 2010

### 2.4 Retail development in CAZ

2.4.1 The CAZ contains a vibrant, successful and diverse retail offer at a scale and quality that makes it a shopping destination of global significance. It contains a range of nationally unique retail centres and clusters which perform different roles and functions in the wider London Plan town centre network<sup>81</sup> including:



West End, International centre

- Internationally recognised centres West
  -The West End (including Oxford Street,
  Regent Street and Bond Street) and Knightsbridge;
- 2) **CAZ [retail] Frontages** significant retail centres recognised in the London Plan Annex 2. In terms of scale these are broadly comparable to Major or District centres in the London Plan town centre network.
- 3) The West End Special Retail Policy Area (WESPRA) including Covent Garden and Soho where retail should complement the strategic cultural, leisure, evening and night time economy roles of these areas.
- 4) Locally identified CAZ frontages/ centres these are smaller clusters/parades of retail and related uses broadly comparable to local/ neighbourhood centres in the London Plan town centre network and generally serving very localised catchments.
- 5) **Specialist retail destinations/ clusters** including for example Covent Garden, Carnaby Street, arcades, street markets, covered and specialist markets and niche retailing including for example, Hatton Garden (jewellery), Saville Row (bespoke tailoring), Denmark Street (music), Camden Passage (antiques) and St.James's/ Mayfair (art galleries/retail/antiques). Some of these specialist retail destinations/clusters may also be recognised in categories (1) to (4) above.
- 6) **Other clusters** including areas within CAZ defined in Local Plans as being appropriate for retail development and ancillary clusters of retail associated with public transport termini and stations.
- 2.4.2 The emergence of multi-channel retailing has presented both challenges and opportunities within the CAZ. Many retailers are responding to rapid growth in internet- based retailing by providing 'click and collect' services and using flagship central London stores to 'showcase' products bought either in-store or on-line<sup>82</sup>. Despite the economic climate since 2008 and rapid growth in internet-based retailing<sup>83</sup>, retail vacancy rates in CAZ have fallen significantly over the past 7 years<sup>84</sup>. Over the period 2013-2036, the CAZ is projected to need between

<sup>81</sup> See London Plan policy 2.15 and Mayor of London, Town Centres SPG, GLA, 2014

<sup>&</sup>lt;sup>82</sup> See Beyond Retail. Redefining the shape and purpose of town centres. BCSC taskforce, 2013; The Grimsey Review. An Alternative Future for the Hight Street, 2013.

<sup>&</sup>lt;sup>83</sup> Experian Business Strategies. Consumer Expenditure and Comparison Goods Floorspace Need in London. GLA, 2013

<sup>84</sup> Mayor of London. 2013 London Town Centre Health Check Analysis Report. GLA, 2014

700,000 to 900,000 sqm of additional comparison goods retail floorspace<sup>85</sup>. This suggests that the CAZ will continue to function as a competitive location to provide multi-channel retailing and secure investment in higher quality comparison retail floorspace. Local retail needs assessments should test this broad strategic assessment of demand for comparison goods retail, updating the assumptions on population, consumer expenditure growth and flows, special forms of trading and, in particular, demand from workers and tourists.

### Accommodating projected demand for retail development in CAZ

- 2.4.3 Whilst retail is a key strategic function of the CAZ it is not necessarily appropriate in all parts of the CAZ and a more nuanced policy approach should be taken which reflects the different circumstances of different parts of the CAZ.
- 2.4.4 As a general principle large scale (greater than 2,500sqm) retail development and comparison goods retail should generally be focused on the International centres,
  - the London Plan CAZ Frontages and other locations as defined in local plans. Retail of a more local scale and catchment, and in particular convenience goods floorspace, can be focussed on any of the locations in paragraph 2.4.1.
- 2.4.5 Having regard to this general framework and evidence in strategic and local retail capacity assessments, boroughs are encouraged to make clear in Local Plans where new retail development



Lower Marsh CAZ frontage

(comparison and convenience goods) will be encouraged in the CAZ – including new CAZ retail frontages where appropriate – and indicate where proposals will need to fulfil sequential and impact testing in the terms of the NPPF and London Plan policy 4.7. This is important to ensure that the vitality and viability of all retail locations in the CAZ (set out in paragraph 2.4.1) and town centres, particularly those just outside the Zone, is not undermined by large scale new retail development within the Zone itself.

### Qualitative considerations

2.4.6 As well as the quantity of retail space, regard should be taken to the quality of space to meet modern retailer requirements with flexibility for innovative retail formats sensitively designed and integrated within the distinctive CAZ environment. Where there are identified capacity constraints within the existing framework of centres and CAZ frontages, stakeholders are encouraged to consider the scope for new or extended CAZ frontages to meet identified demand and to bring these forward through Local Plan and London Plan review mechanisms.

<sup>85</sup> Experian Business Strategies, 2013 op cit.

### The West End

2.4.7 The West End (parts including Oxford Street, Regent Street and Bond Street) is promoted in the London Plan as a global shopping destination (along with Knightsbridge). Alongside its international reputation for retailing, the wider West End (including WESRPA) includes a world class mix of culture, entertainment, eating out and business. These key strategic functions of the West End are complemented by its residents and a careful balance will need to be struck between maintaining this unique mix of uses and places whilst ensuring that new residential development does not compromise the strategic functions of the area. The Mayor and Transport for London will work with Westminster and Camden Councils to promote the future success of the West End. This includes the implementation of Crossrail and work to fulfil the vision of the West End Partnership (WEP) regarding Oxford Street and the wider West End. The WEP was set up on the recommendation of the West End Commission<sup>86</sup>, the independent review of the West End which reported in 2013.



West End live

<sup>86</sup> West End Commission. Final Report. April 2013

### **Specialist retail clusters and markets**

2.4.8 Specialist and niche retail functions are supported and promoted within the London Plan framework (see Policy 2.15 and SPG guidance in paragraph 2.4.1 above), allowing flexibility for new clusters to emerge. In exceptional circumstances where an existing specialist cluster is identified as having particular significance to London's unique identity or cultural heritage,



**Borough Market** 

boroughs may consider introducing Special Policy Areas to support and sustain them (see Section 6.2).

2.4.9 Street markets, covered and specialist markets also play an important role in the vibrant CAZ retail offer. The Zone includes several distinctive markets including for example Covent Garden, Borough Market, Leadenhall Market, Camden Passage, Lower Marsh and those associated with the South Bank. The range of markets should be promoted in the terms of London Plan policy 4.8Be complementing other measures to improve their management and improve their offer<sup>87</sup>.

<sup>87</sup> see also the Mayor's Town Centres Supplementary Planning Guidance. GLA, 2014



## **SECTION 3:**

# ENHANCING THE DISTINCT ENVIRONMENT AND HERITAGE OF THE CAZ

### 3.1 Introduction

3.1.1 This part of the SPG sets out guidance on enhancing the distinct environment and heritage of the CAZ. It charts the evolution and heritage of central London, provides examples of accommodating growth through contextual change in CAZ and includes supplementary guidance on tall buildings. It highlights the importance of place shaping, public realm and inclusive access. Section 3 also addresses other environmental issues with a particular central London dimension including the urban heat island effect, surface water management and improving air quality.

### 3.2 The evolution and heritage of Central London

- 3.2.1 London is one of the most important historic cities in the world, with the CAZ capturing much of what is so internationally recognisable about our city. Understanding the characteristics that make its fabric and environment so unique and distinctive is key to identifying how London can change without losing its essential qualities that are valued by visitors, businesses and residents.
- 3.2.2 London has always been a market town a place to trade and to share ideas. Established by the Romans in the 1st century A.D, on the banks of the River Thames, Londinium became a thriving centre of commerce importing and selling goods and services. During the Middle Ages the City of London developed as an internationally important trading centre. To the west Westminster developed as the seat of Government, the monarchy and the courts, framed by the creation



St Paul's Cathedral from Southwark Bridge, City of London, 1855 Image reproduced by permission of Historic England

- of key open and green spaces that later formed the Royal Parks. The impact of this activity on the townscape can still be seen in the dense urban grain reflected in the plot and street patterns of much of central London.
- 3.2.3 London rapidly expanded in the 16th 17th centuries, growing from 50,000 60,000 residents in the 1520s to 200,000 in 1600 and 575,000 by 170088. As a result of this rapid urbanisation, increasing regulation of the urban form took place along with use of materials such as brick. There were prohibitions on subdivision and new housing within 3 miles of the City gates, other than by Royal licence, and regulation of building quality, throughout the 17th century, at the start of the English Revolution89 and during the rebuilding of London following the Great Fire

<sup>88</sup> The Tudor and Stuart Town 1530 - 1688: A Reader in English Urban History

<sup>89</sup> The Prerogrative and Environmental Control of London Building in the Early Seventeenth Century

- of 1666. London, by the end of the 18th century, had largely extended in size similar to that of the CAZ today. This phase of London's development in addition to its medieval and previous origins gives the CAZ much of its unique character.
- 3.2.4 The expansion of London through the 17th, 18th and 19th centuries saw the development of distinct townscapes of shopping streets, parks and residential squares developed as a series of estates by wealthy landowners. The resulting grid pattern of development and defined Royal Parks in the West End contrasted with the medieval townscape of the City of London. The dominant form of development in these Great Estates during this period was the terraced townhouse, whether for the aristocrat or the artisan. Grosvenor, Cadogan, de Walden, Portman and Bedford as well as the Crown Estate and the City of London Corporation still control much of central London and maintain its unique character.
- 3.2.5 Since the development of Westminster in the 11th Century, the City of London has had a hinterland, or suburbs. However, the concept of a central business district of the city where the main focus of the use of land is for office, retail, leisure and institutional uses, was truly developed with the arrival of the railways. The major infrastructure projects of the Victorians with the Underground and railway termini at Liverpool Street, Fenchurch Street, Kings Cross, St Pancras, Euston, Marylebone, Paddington, Victoria, Waterloo and London Bridge, defined the extent of much of what we see as central London



The construction of Holborn Viaduct, looking west, completed 1869. Reproduced by permission of Historic England

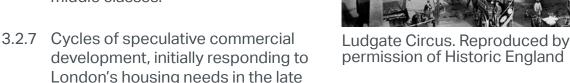
today. The areas that extend to Nine Elms and Elephant and Castle also follow the line of railways, and later the tramways. The use of the buildings and areas between the stations evolved over the 19th century, with clusters of businesses and professions developing, many small or medium sized, often reusing former residential buildings. Institutions developed beside these, designed to supply and manage a global commercial empire which traded out of the docks downstream. This concentration of infrastructure and evolution of land uses required and enabled London to expand in size, and for the central area to develop distinctive commercial characteristics, on a larger scale.

3.2.6 Architecturally this shift in land-use is evident in the larger buildings which had increasingly elaborate facades in stock and red brick, faience, terracotta and

the Lost Opportunity, Barnes, Cal. L Rev. Vol 58, No 6, Article 2

Portland stone that responded to new architectural fashions. New building types such as department stores, the national cultural institutions, the law courts and the major banking houses of the City developed, dominating the townscape. In many places these were joined during the 20th century by larger commercial offices and higher density housing for the working and middle classes.

in inner-London following World War Two.





17th and early 18th century and then to accommodate new pressures for light industrial, office and leisure space, have led some sites to be redeveloped several times. Land assembly schemes associated with this have created very large sites in some places, interwoven within the fine grain of the historic city. By the end of the 19th century, the industrial revolution and land values impacted on the density of developments and slum clearance, with the rise of mansion blocks as a form of accommodation for office workers. Other notable urban improvement schemes of the 19th and 20th centuries include projects by the Metropolitan Board of Works such as the Victoria and Albert embankments in the mid Victorian period, the London County Council's ambitious Thames bridge reconstruction, tramway extension and housing schemes of the inter- war years, and by the City of London's redevelopment projects and housing estate construction elsewhere

- 3.2.8 Different layers of historical development have been added over the centuries, to the extent that London is a tapestry of different townscapes and characteristics. In particular within the central area there are numerous distinctive historic places that are known throughout the world in their own right. Places such as Bloomsbury, Soho, Marylebone, Borough, the Inns of Court, Hatton Garden, Mayfair and Bank, which owe much of their individual charm to their pre-railway character. The places are unique in themselves, but related in that they often act as a focus for specialist uses and activities with the later additional development enriching their earlier character. The overall result of this is a rich and diverse architectural legacy, with different style and scale of buildings close together with a complex network of streets, squares, lanes, alleys, boulevards and set pieces providing central London with a visually stimulating and varied townscape.
- 3.2.9 London's international identity is built on the distinctive character and historic environment of central London. Its principal characteristics are its:
  - centrality;

- presence of the River Thames and its green spaces such as the Royal Parks and London Squares;
- connectivity to outer London and beyond through its network of roads, railways and waterways;
- density of commercial uses, intermixed with other key uses such as institutional, residential, and cultural;
- national and internationally important institutions that have created distinctive places with distinguishing building types and spaces; and
- its ability to interweave new developments with the fabric of previous layers that result in a rich built fabric of considerable historic interest.
- 3.2.10 The rich historic fabric of central London is reflected in the high concentration of heritage designations (see Figure 3.1). This includes:



Barbican Centre Copyright © Historic England

- Two UNESCO World Heritage Sites the Palace of Westminster/ Westminster Abbev, and the Tower of London
- Extensive known and yet to be discovered archaeology including notable scheduled monuments such as the Roman Wall, The Roman Amphitheatre, Queenhithe Docks, the original Globe Theatre and a number of Livery Halls
- Approx. 4000 list entries of which many include multiple listed buildings dating from 11th-20th centuries
- 70-80 per cent by area are covered by conservation areas
- Four Royal Parks and 400+ protected London Squares as protected under the 1931 Act Numerous locally listed heritage assets.
- 3.2.11 These designations contribute towards the unique cultural offer of London and its predominance as a world city. In addition the historic fabric of central London provides important context to inform future developments.
- 3.2.12 London's heritage attracts business as well as tourists and benefits its economy. It is therefore important that the historic environment is invested in to maintain and enhance it. Heritage is an integral consideration in other topics covered in this SPG particularly: business clusters (section 1.6), culture, tourism and retail (section 2) and the public realm (section 3.5).

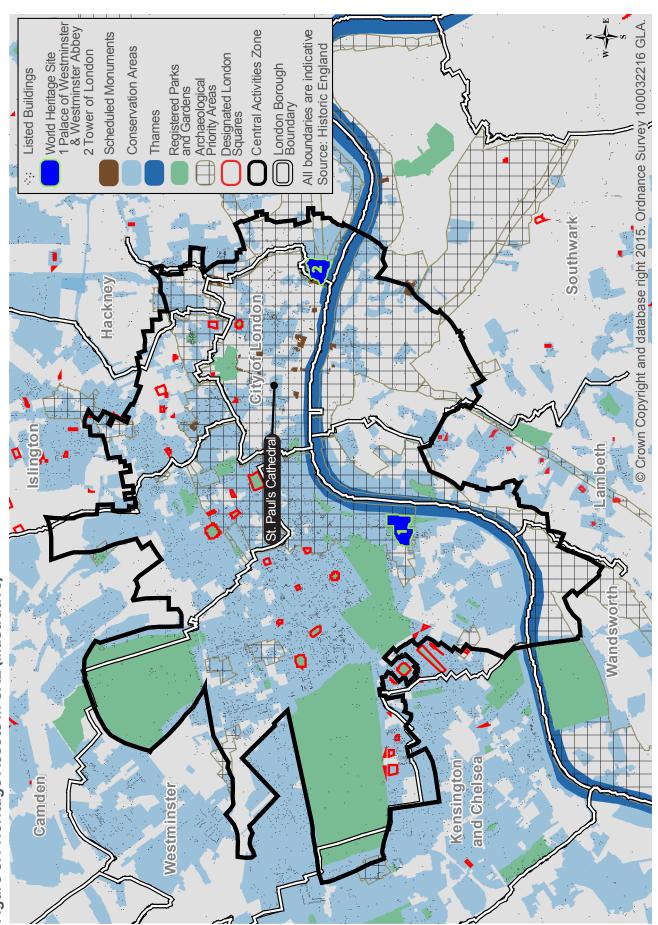


Figure 3.1 Heritage Assets in CAZ (illustrative)

### 3.3 Accommodating growth through contextual change in the sensitive CAZ environment

- 3.3.1 The London Plan includes a range of policies to ensure that the quality and function of development enhances London's living places and spaces, heritage, character and strategic views.<sup>90</sup> It is recognised that change is an essential component in the continued success of places as is demonstrated by the evolution of central London. Sensitive adaptation and re-use of the historic environment along with high standards of design in new development can help make better places and stronger, more inclusive<sup>91</sup> communities that balance the value of the past with the potential of the future.
- 3.3.2 In order to achieve this a close collaboration of all relevant stakeholders should take place to understand the heritage values that make a building, landscape or place unique and how new development including new infrastructure, can complement them. Analysis of the significance of the assets being considered for adaptation or incorporation into a large scheme, plus their relationship within a place, can provide a basis in which to identify options for change and growth. Contextual issues to consider include the surrounding urban structure, grain, pattern, form and relationship of open spaces and through routes, scale of adjoining buildings and wider skyline issues. This approach should inform the potential of a site to accommodate development and define any design response as a reflection of the context of the site and its surroundings.
- 3.3.3 Conservation Area Appraisals, Conservation Area Management Plans, character studies, view management frameworks, World Heritage Sites Management Plans and Statements of Outstanding Universal Value can be used to help with the process of understanding and valuing historic interest. Where gaps in knowledge exist then character appraisals, urban design studies, heritage statements and robust visual and skyline analysis should be developed that help define the historic interest and ensure new developments integrate with the evolving character of central London.
- 3.3.4 Overleaf are a series of examples which help illustrate how new developments can be successfully integrated into the historic context of central London.

<sup>&</sup>lt;sup>90</sup> London Plan policies: 7.4. Local Character, 7.5 Public Realm, 7.6 Architecture, 7.7 Location and Design of Tall Large Buildings, 7.8 Heritage Assets and Archaeology, 7.9 Heritage-led regeneration, 7.10 World Heritage Sites, 7.11 London View Management Framework, 7.12 Implementing the London View Management Framework.

<sup>&</sup>lt;sup>91</sup> See Mayor of London. Accessible London: Achieving an Inclusive Environment Supplementary Planning Guidance. GLA, 2014 – section 4.12



**One Vine Street, Westminster** (Allies and Morrison): Refurbishment of a historic corner building, with new wings that reflect the strong lines of the original building, and with complimentary facing materials, thus ensuring the retention of a characterful streetscape.



**30 Finsbury Square** (Eric Parry) on the edge of the City of London: This modernist office development successfully reflects the historic materials, composition and scale of the surviving Edwardian office developments. This responds to the formal planning and sense of enclosure of Finsbury Square.



**Kingly Street, Fouberts Place, in Soho** (Rolfe Judd Architects): Combines the palette and form of Carnaby Street's Georgian houses with vivid glazed tiles and modern shopfronts. The development reflects the street's fashionable reputation by introducing new modern features and reinforcing its historic character.







The Granary Kings Cross (Stanton Williams): Integrates the grade II listed Granary building and transit sheds with a new 200m long building for Central St Martin's that incorporates theatres, dance studios and a new covered central street. This is a triumph of contextual regeneration, with re-energised heritage buildings providing a catalyst and focus for a new vibrant London quarter.



**20 Bishops Square** on the fringe of the City of London (Matthew Lloyd Architects): Development including housing, mixed-use and restaurant. Reflecting the materials of the adjacent grade II St Botolph's Hall, No.20 Bishops Square uses terracotta batons in a startling modern but contextual way, that reinforces the significance of the heritage asset.



**British Museum extension** (Rogers Stirk Harbour): Unabashedly modern in its functional form, the British Museum extension uses a sober palate of materials to reference the classical monumentality of the British Museum, while cleverly providing the climate control and high spec required for modern museum uses.





**Tower Bridge Road** (Michael Squires architect): Taking its cue from the warehouses of Shad Thames and Wapping, this housing development uses the grand scale of London's 19<sup>th</sup> Century mercantile history to create high density modern housing, with details such as the balconies reflecting the historic gantries of the warehouses.



### Rivington Place (David Adjaye):

Tucked into a back street in the heart of Shoreditch, Rivington Place is the first new public gallery in London for 40 years. Incorporating artistic inspiration with the scale and massing of adjacent industrial buildings, Rivington Place is striking without overwhelming the streetscape.



(O' Donnell and Tuomey Architects): Lying within the Strand Conservation Area the See Saw Hock Student Centre uses the narrow network of streets to great advantage, creating an intriguing and highly original building which uses Flemish-bond red brick and carefully manipulated facades to integrate it with its historic surroundings.



### 3.4 Tall Buildings and CAZ

- 3.4.1 Tall buildings are those that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor (25m adjacent to the River Thames, 150m anywhere else in the City of London, and 30m elsewhere in London).
- 3.4.2 It is recognised that much of the CAZ is sensitive to tall building development. London Plan Policy 7.7 advocates a plan led approach to tall buildings. Boroughs should identify in their Local Plans which areas are appropriate, sensitive or inappropriate for tall buildings. These areas should be consistent with the criteria for tall buildings set out in Policy 7.7. Neighbouring boroughs should work together to ensure a consistent approach is taken to identifying appropriate areas for tall buildings, particularly near borough boundaries as well as assessing and planning for the cumulative impact of tall building developments.
- 3.4.3 Figure 3.2 presents tall buildings in CAZ (by number of storeys) either completed 2008-2015, under construction or permitted/ not started as at 1st April 2015. It illustrates the relationship between these developments and the London Plan/ LVMF<sup>92</sup> viewing corridors, World Heritage Sites and conservation areas. It shows strong clustering in parts of the City and several of the CAZ Opportunity Areas notably Vauxhall Nine Elms Battersea (VNEB), London Bridge/ Bankside (including north of Blackfriars Road), parts of the City Fringe, Elephant & Castle, King's Cross, Paddington and Victoria. Other emerging clusters include those around Old Street and parts of the City Road in Hackney/ Islington.
- 3.4.4 Figure 3.3 provides a strategic illustration of areas where there are either existing or emerging tall building clusters in the CAZ. The yellow circles indicate the general location of tall building clusters and do not represent geographic boundaries of where tall buildings are appropriate. A list of the current relevant planning policy documents is provided for each area, however this is not an exhaustive list and the borough Local Pan team should be contacted for detailed up-to-date policy advice for each area. Other areas of tall building development may be brought forward through a plan led process and applications for tall buildings will be considered in light of London Plan and Local Plan policies.

<sup>92</sup> London View Management Framework (London Plan Policies 7.11 and 7.12)

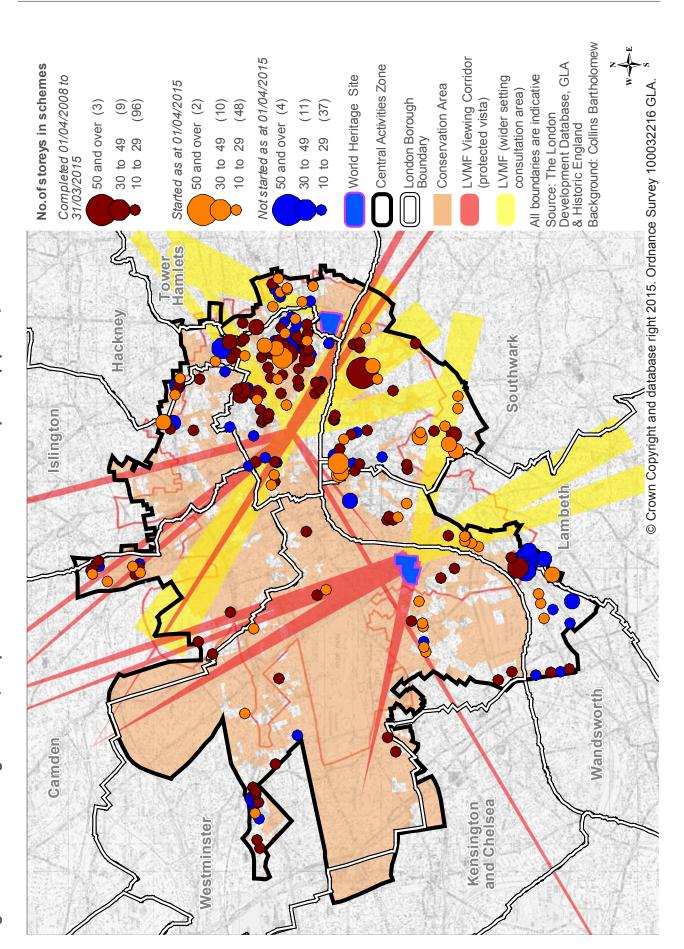


figure 3.2: Tall buildings in CAZ (completions 2008-2015 and development pipeline)

figure 3.3: Indicative existing/emerging tall building clusters in CAZ

Islington's Development Management Tower Hamlets Core Strategy (Sep 2010) Policies (Jun 2013) Document (Apr 2013)	10. Aldgate12. Old StreetTower Hamlets Core StrategyCity Fringe OAPF (Dec 2015)(Sep 2010)Finsbury Local Plan - AAP for Bunhill and Clerkenwell (Jun 2013)Document (Apr 2013)Clerkenwell (Jun 2013)Locyment (Apr 2013)Islington's Development Management Policies (Jun 2013)L1. Broadgate / BishopsgateIslington's Core Strategy (Feb 2011)City Fringe OAPF (Dec 2015)Hackney Core Strategy (Nov 2010)Hackney Core Strategy (Nov 2010)Hackney Tall Building Strategy (Feb 2005)City of London Local Plan (Jan 2012)Camden Core Strategy (2010)City of London Protected views SPD (Jan 2012)Camden Core Strategy (2010)	Camden Site Allocations (Sep 2013)  14. Euston Euston Area Action Plan (Jan 2015) Camden Core Strategy (2010) Camden Development Policies (2010)	Westminster	Sourthwark  Southwark  Southwark	
L. Faddington Westminster's City Plan: Strategic Policies (Nov 2013) Westminster's UDP (Jan 2007)	lan: Strategic Policies (Nov2013)  lg Brief (Jul 2011)  lan 2007)  ls Battersea  2)  3)  g Study (updated 2014)  gy (adopted Jan 2011)  relopment Plan (Aug 2007)  rategy (Oct 2010)  pment Management Policies	Document (Oct 2012) Site Specific Allocations Document (Feb 2012) Stage 1 Urban Design Statement - Tall Buildings (2009) Stage 2 Urban Design Statement - Tall Buildings (2011)  4. Waterloo Waterloo OAPF (Oct 2007) Waterloo SPD (Apr 2013) Lambeth Tall Building Study (updated 2014) Lambeth Coll Strategy (adopted Jan 2011)	5. Blackfriars Blackfriars Road SPD (Jan 2014) Southwark Core Strategy (Apr 2011) 6. London Bridge Southwark Core Strategy (Apr 2011)	7. Elephant and Castle Elephant and Castle SPD/OAPF (Mar 2015) Southwark Core Strategy (Apr 2011)  8. The City e as tern clus ter City of london local plant (1920)	) (Jan2012)

### 3.5 Public realm in the CAZ

- 3.5.1 Some parts of the CAZ benefit from public realm of exceptional quality including the River Thames, Royal Parks, London Squares, numerous pocket parks and other formal and informal green and open spaces. Other parts of CAZ public realm suffer from inadequate investment, a lack of maintenance and blighted by poor development.
- 3.5.2 In line with London Plan policy 7.5, public space in the CAZ should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context and incorporate the highest quality design, landscaping, planting, street furniture and services.
- 3.5.3 For the CAZ to continue to flourish it is essential for successful spaces and streets<sup>93</sup> to be managed, maintained and conserved and for substandard spaces to be improved. The multitude of uses and building density within the CAZ creates a need for a wide range of diverse and adaptable public spaces due to the area's role as London's commercial and cultural heart with its distinctive character and world class built environment.
- 3.5.4 Individual neighbourhoods within the CAZ have their own character, based on their combination of uses, footfall, street pattern, street widths and grain. Soho, for example, with its entertainment and night time economy, fine grain of narrow streets, relative lack of through streets, high footfall and low vehicular flow, has a particular character which differs from other neighbourhoods, such as Chinatown and Leicester Square to the south. Thoroughfares within the CAZ tend to have separate characters in themselves, and their own clusters of uses, such as Regent and Oxford Streets (world- class retail attraction), Shaftesbury Avenue (entertainment attractions) and Euston Road (rail hubs and interchanges). (See Box 3.1: Transforming Leicester Square).
- 3.5.5 Public space design should allow people to congregate informally, relax and enjoy social interaction. High quality, well-managed public space has a significant and positive impact on the CAZ as a place to locate and do business and to attract and retain business and employees. It also improves people's quality of life as measured by a number of health and social factors. It is essential the CAZ has spaces which help to strengthen both residential and business communities, as well as providing a secure, welcoming environment that encourages visitors and tourists to linger.

<sup>&</sup>lt;sup>93</sup> TfL Streetscape Design Guidance https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit. Manual for Streets (I & II) https://www.gov.uk/government/publications/manual-for-streets

### **Box 3.1: Transforming Leicester Square**

At the heart of London's West End, Leicester Square functions both as an entertainment hub and a destination in its own right. It is home to many venues including cinemas, bars, clubs, cafes, restaurants and hotels; and it regularly hosts major film premieres. The 2012 transformation, part funded by local businesses, restored Leicester Square as an international landmark. The square was previously perceived as uninviting, unsafe, cluttered and tired.



The new design opens up the central gardens and has created a ribbon of stone seating to frame the garden square. Altogether Leicester Square has become a more inviting place for its daily 250,000 visitors to dwell, adding to its vibrancy and the success of local businesses.



In addition to the investment in the public realm, a collaboration of land owners, the Heart of London Business Improvement District, Westminster City Council and TfL delivered improved lighting, better street management, cleansing and refuse collection and more coherent management of outdoor dining to enhance visitors experience and perceptions of safety. The scheme cost £15.3m, with £2.8m from Leicester Square property owners.

- 3.5.6 It is also essential that public spaces provide for the safe and convenient movement of people through the CAZ, particularly vulnerable road users (see 'Streets for All' guidance for planners<sup>94</sup> and highway engineers and designers<sup>95</sup>). Solutions should carefully consider the best way to accommodate motorised transport, particularly the freight and servicing on which the economic vitality of the CAZ depends.
- 3.5.7 Building on the Roads Task Force approach, TfL and boroughs are engaged in the classification of roads into Street Types, which can be used to help develop successful places by:
  - 1) measuring the performance of the relevant street;
  - 2) setting goals of improving the performance of the street to the relevant benchmark for that Street Type;
  - encouraging sustainable and accessible movement to areas which attract significant numbers of people with minimum impact on the other service levels applicable to that street;
  - 4) ensuring complementary and flexible street designs allow goods and servicing to reach these new areas of high people activity without unduly impacting the benefits accrued through placemaking; and
  - 5) planning how the impact of redistributing highway space to other modes of movement or to support civic amenity will be mitigated in areas beyond that directly influenced by any new scheme.
- 3.5.8 It is also important for the green spaces in the CAZ, including street trees, to be maintained for current and future enjoyment. Guidance is available for designers, planners and developers<sup>96</sup>.

### 3.6 Inclusive access in the CAZ

3.6.1 One of the Mayor's aims for London is that everyone, whether resident, visitor or worker, is able to participate and enjoy all that the city has to offer. London Plan policy 7.2 and the Accessible London SPG<sup>97</sup> provides guidance on implementing inclusive design principles effectively and therefore creating an accessible environment in London, with particular emphasis on the access requirements of disabled and older people. Within the Central Activities Zone key considerations include inclusive access to:

<sup>&</sup>lt;sup>94</sup> Streets for All: A guide to the management of London's streets (2000). Planners. https://content. historicengland.org.uk/images-books/publications/ streets-for-all-guide-to-management-of-londons-streets/streets-for-all-london.pdf

<sup>&</sup>lt;sup>95</sup> Streets for All: A guide to the management of London's streets (2000). Highway engineers and designers. http://historicengland.org.uk/advice/caring-for-heritage/streets-for-all/highway- engineers-and-designers/

<sup>&</sup>lt;sup>96</sup> Mayor of London. All London Green Grid SPG. GLA, 2012; Historic England (2011), London's Urban Forest - A Guide for Designers, Planners and Developers - The Canopy (2011). https:// content. historicengland.org.uk/images-books/ publications/canopy/canopy.pdf/

<sup>&</sup>lt;sup>97</sup> Mayor of London. Accessible London: Achieving an Inclusive Environment Supplementary Planning Guidance. GLA, 2014

- 3.6.2 **Employment** the CAZ supports over 1.7 million workforce jobs in a wide range of employment sectors<sup>98</sup> Policy 4.12 of the London Plan provides the spatial context for strategic partners to co-ordinate the range of national and local initiatives necessary to improve employment opportunities for Londoners, to address barriers to employment and progression and to tackle low participation in the labour market.
- 3.6.3 **Public realm** The design of the external environment and the public realm in CAZ (which is often congested and limited) is an essential consideration if it is be inclusive and accessible. Guidance is provided in Section 3.5 of this SPG and Section 4.2 of the Accessible London SPG.
- 3.6.4 **Public transport, parking, cycling and walking** The Mayor is committed to making public transport and the pedestrian environment more accessible for everyone a key issue for the CAZ. Poor provision for disabled persons parking and drop-off/pick- up is also a concern in CAZ<sup>99</sup>. Guidance on promoting more inclusive transport is provided in Section 4.3 of the Accessible London SPG.
- 3.6.5 **Shopping** although progress is being made in making retail centres more accessible, disabled people still remain disproportionately excluded from many shopping activities in parts of central London<sup>100</sup>. Guidance on promoting more inclusive shopping is provided in Section 4.5 of the Accessible London SPG.
- 3.6.6 **Art, culture and entertainment and accessible visitor facilities** the scale and density of these activities in CAZ is unique in a London context. Guidance is provided in Sections 4.9 and 4.10 of the Accessible London SPG.
- 3.6.7 **Historic environment** the scale and significance of heritage assets in the CAZ is set out in Section 3.2. Guidance on improving inclusive access to London's heritage buildings, assets and their settings is provided in Section 4.12 of the Accessible London SPG.

### 3.7 Climate change adaptation

#### Urban heat island effect

3.7.1 Due to the density of surfaces that absorb heat, and the lower proportion of vegetation, the CAZ suffers from higher local temperatures than surrounding lower density areas. This is called the urban heat island effect. In the summer the inability for the heat to dissipate can make conditions uncomfortable for those living, working and visiting the CAZ. Local increases in temperatures can be exacerbated by the increased use of air conditioning and other plant which expel heat.

<sup>98</sup> GLA Economics. Work and life in the Central Activities Zone, northern Isle of Dogs and their fringes. GLA, 2015

<sup>99</sup> Accessible London SPG, paragraph 4.5.14

<sup>100</sup> Mayor of London. 2013 Town Centre Health Check Analysis Report. GLA, 2014

3.7.2 The CAZ is fortunate to have a wealth of street trees and numerous open spaces, including the River Thames which provide some relief from the higher temperatures. However, it also has constraints that can make addressing the heat island effect more challenging. For example, there may be limited additional capacity for street trees due to services in the street and the number of historic buildings and structures that do not lend themselves to green roofs and walls. Therefore it



is particularly important to take advantage of opportunities when they arise including redevelopment.

- 3.7.3 In line with London Plan policies 5.9 5.11 and 7.19, within the CAZ local authorities should consider:
  - increasing the amount of vegetation within developments and potential for retro-fitting measures including soft landscaping, trees, green roofs/ walls (see the Sustainable Design and Construction SPG, and the All London Green Grid SPG)
  - increasing the number of street trees and other vegetation, including in the form of planters, where they cannot be located within the highway
  - using light coloured surfaces and materials which reflect heat reducing motorised vehicles minimising the need for plant/ equipment that expel heat into the atmosphere
  - · improved ventilation to buildings and reducing the use of chillers
  - addressing biodiversity and access to nature issues in policy 7.19 in the unique circumstances of CAZ.
- 3.7.4 A GLA audit<sup>101</sup> shows there are around 700 green roofs in central London, covering an area of over 175,000sqm. The Mayor is working with business to create more rain gardens, green roofs and green walls in central London. The GLA has supported 'green infrastructure audits' for 15 central London Business Improvement Districts or employer groups. Over 500 hectares of London have been audited, which showed over 300 rain gardens, 200 green walls and more than 100 hectares of green roofs could be created, as well as other small scale interventions like planters and window boxes. The GLA is now working with the Cross River Partnership to help districts and employer groups to install these. Businesses have also invested in measures as part of their longer-term refurbishments and regeneration plans. The Mayor's report The Implementation of Green Roofs provides case studies on securing and delivering green roofs.

<sup>101</sup> http://www.london.gov.uk/priorities/environment/ tackling-climate-change/making-london-greener

### **Surface Water Management**

- 3.7.5 It is predicted<sup>102</sup> that the number and intensity of heavy rain storms will increase. Parts of the CAZ are particularly vulnerable to surface water flooding due to low lying land and the high proportion of impervious surfaces. In addition it has many assets that could be particularly sensitive to surface water flooding such as the London underground, utilities and basements, many of which house essential and back-up plant.
- 3.7.6 Boroughs should consider the management of surface water in line with the hierarchy in London Plan policy 5.13. However it is recognised that due to the location and density of many developments there may be limitations on the ability to achieve greenfield run- off rates. Nevertheless virtually all developments are likely to be capable of reducing surface water discharge and sites close to the Thames should consider the opportunity to discharge surface water into the river. For the Vauxhall Nine Elms Battersea area an Integrated Water Management Strategy is in place to enable most of the area to be drained sustainably. A similar approach may be appropriate in other Opportunity Areas within the CAZ. The Environment Agency has produced surface water flood risk maps<sup>103</sup>. They provide detailed surface water flood risk information for any area within the CAZ.
- 3.7.7 Developers and boroughs should consider the design of new basements and consider the impact new development will have on low lying land uses such as basements in adjoining and nearby developments.
- 3.7.8 Wherever practical, development should incorporate green roofs, soft landscaping specifically designed to maximise surface water attenuation and absorption, as well as retention measures designed into hard landscaping that slow the flow of water by holding it in situ. Development can also be designed to temporarily hold some surface water for a short period. This practice is known as "Design for Exceedence".

### Flood Risk Management

3.7.9 Developments adjacent to the River Thames will need to consider long term flood risk management and the likely need for the raising of flood defence walls along the Thames from the middle of the century. New development should consider this issue within its design to avoid blocking access and views to the Thames.

### 3.8 Environmental quality/ Amenity

### Air quality

3.8.1 The air quality in the CAZ is particularly poor due to the intensity of the road network and land uses. These result in large volumes of traffic movements and a higher density of boilers which emit air pollutants. The CAZ also experiences high levels of construction which results in dust and emissions from construction activities and equipment which also adversely affect air quality.

<sup>&</sup>lt;sup>102</sup> UKCP09 http://ukclimateprojections.metoffice.

<sup>103</sup> http://watermaps.enviroment-agency.gov.uk/wiyby.spx?topic=ufmfsw#x=532183&y=180222&scale=9

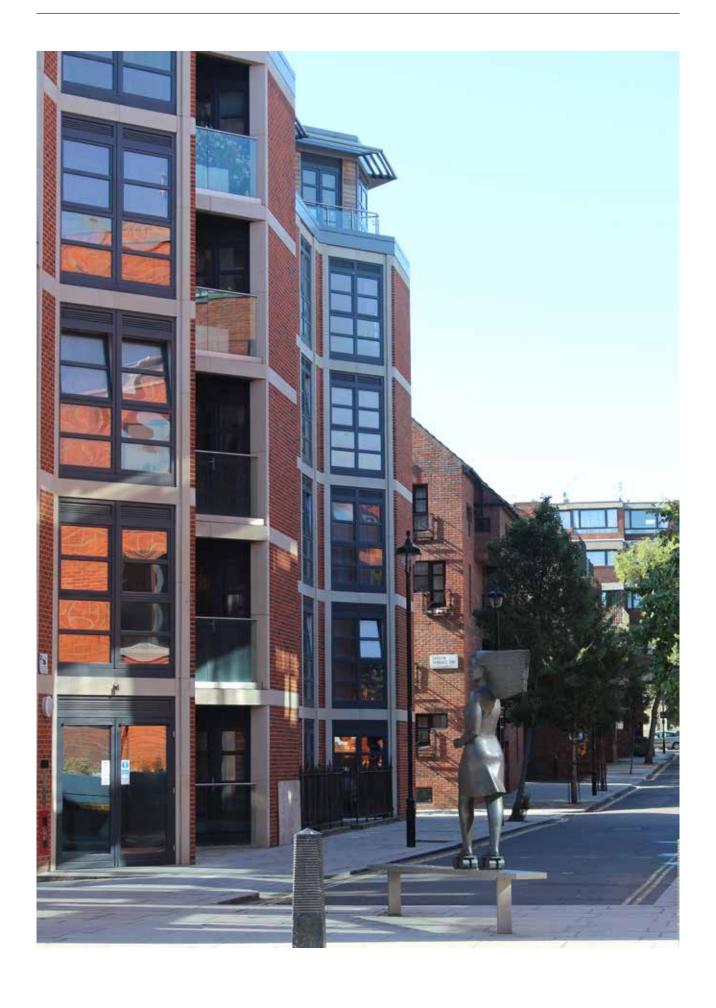
- 3.8.2 Local authorities should have regard to London Plan policy 7.14 and the Mayor's Air Quality Strategy which set out measures that can be taken to enable developments to be 'air quality neutral' and to minimise the exposure of building occupants and visitors to poor air quality. In addition to the Ultra Low Emission Zone (ULEZ), measures to reduce the environmental impact of transport are needed, including provision of electric vehicle infrastructure and promoting more sustainable modes such as walking and cycling. The Mayor is working with boroughs through his Air Quality Fund to reduce pollution and improve the environment. Measures to improve air quality at ground level include the provision of additional vegetation. The Air Quality Street Design Toolkit shares best practice and facilitates the inclusion of measures to improve air quality at and around new developments.
- 3.8.3 With regard to construction, development sites in the CAZ can often be constrained by adjoining buildings, congested roads and pavements and limited space on-site. It will be essential that local authorities, partners and developers consider site constraints and manage the construction process carefully. Further guidance is provided in the Mayor's SPGs on 'Sustainable Design and Construction' 104 and the 'Control of dust and emissions from construction and demolition sites'. 105

### Noise

- 3.8.4 As with air quality, the ambient noise level in the CAZ is generally higher than other parts of London due to the intensity of vehicle movements and other activities. Whilst ambient noise levels subside at night time the density of night time uses can result in neighbour amenity issues in the CAZ. As the number of visitors to London increases along with the number of residents in the CAZ, there is the potential for increased tension between night time uses and residents.
- 3.8.5 Boroughs should consider their local approaches to protecting both new and existing residents as well as existing businesses. New residential development should consider the local context and be designed to enable existing businesses to continue to operate in a reasonable manner by considering the existing sources of noise as well as the level and frequency of the noise. This is particularly important in the case of new residential development introduced near to existing noise generating cultural venues (see Section 2.2). Designs to address neighbour amenity issues from noise impacts should enable residents to open their windows in the summer for natural ventilation. Therefore more sensitive uses such as bedrooms may need to be located away from the street and all development residential and non- residential should be constructed with sufficient sound insulation to minimise the impact of noise on or from the proposed use.
- 3.8.6 One of the easier elements of noise generation to control is that from plant and equipment. Plant should be selected and located to minimise its impact on neighbouring property. It should only be operated when required and should be regularly maintained.

<sup>&</sup>lt;sup>104</sup> Mayor of London. Sustainable Design and Construction SPG, GLA2014

<sup>&</sup>lt;sup>105</sup> Mayor of London. The Control of Dust and Emissions SPG, GLA 2014



## **SECTION 4:**

# HOUSING IN CAZ

#### 4.1 Introduction

4.1.1 This part of the SPG provides advice to boroughs on how they should seek to meet and exceed housing targets in the London Plan whilst continuing to sustain and enhance the strategic functions of the CAZ. Guidance is also provided on promoting mixed and balanced communities across the Zone, student housing, and social infrastructure.

#### 4.2 Enabling housing capacity without compromising strategic CAZ functions

- 4.2.1 Housing delivery within the CAZ makes an important contribution to overall housing supply in London, providing on average around 2,000 net additional conventional homes a year between 2004/5 to 2013/14<sup>106</sup>. This amounts to approximately 8 per cent of overall conventional housing completions in the capital<sup>107</sup>. In addition to this, an average of 700 net new non-self contained housing units have been delivered each year over the same period, reflecting the concentration of universities within the Zone. Over the next 10 years the London Strategic Housing Land Availability Assessment (SHLAA) identifies capacity to deliver over 40,000 homes within the CAZ, with the majority of this capacity expected to be brought forward in opportunity areas<sup>108</sup>. As in other areas of London, delivering this level of housing output in order to meet housing need will require recent levels of housing completions in parts of the CAZ to be increased.
- 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 floorspace. As recognised in Section 1 of this SPG, high residential values within central London have the potential to increase pressures on office floorspace provision within the CAZ, including more affordable office stock. Without sensitive management, there is concern that these trends could erode the office function of the Zone and diminish the overall offer of the CAZ as a competitive national and global office location. In addition, it is important to ensure new residential and mixed use development supports and complements other important strategic CAZ functions, including retail, leisure, entertainment and cultural activities. Whilst all boroughs should address the London Plan requirement to seek to achieve and exceed minimum housing targets (Policy 3.3), a sensitive and carefully balanced approach to accommodating and designing residential and mixed use development should be taken by CAZ boroughs in particular locations, taking into account: the strategic need to enhance and sustain office and other strategic functions within the CAZ; guidance in Table 1.1 (Section 1.3) of this SPG; the requirement to meet housing need; and the important role of opportunity areas in delivering additional housing.

<sup>&</sup>lt;sup>106</sup> London Development Database, conventional housing completions (financial years 2004 to 2013)

<sup>&</sup>lt;sup>107</sup> London Development Database, non-conventional housing completions (financial years 2004 to 2013)

<sup>108</sup> Note that the SHLAA identifies both conventional and non-conventional housing capacity.

#### 4.3 The role of opportunity areas in delivering housing capacity in the CAZ

Vauxhall Nine Elms Battersea Opportunity Area

4.3.1 As with London as a whole, mixed use development in opportunity areas is expected to play a critical role in meeting housing need and delivering additional employment capacity. Of the potential housing capacity identified in the CAZ in the 2013 London SHLAA, the majority (83 per cent) is expected to be brought forward in opportunity areas. However, opportunity areas are not all about

housing - over 170,000 jobs are expected to come forward in the CAZ opportunity areas - so ensuring a balance of residential and office uses through mixed use development, alongside provision for other strategic CAZ activities will be particularly important considerations within opportunity areas.

4.3.2 Within the CAZ Opportunity Areas the minimum guidelines for residential and employment capacity set out in London Plan Annex 1 should inform the balance of different land uses in large scale development.

### 4.4 Balancing the need for housing alongside offices and other strategic functions

4.4.1 The criteria in Table 1.1 on page 12 of this SPG advises on the relative weight which should be given to office and other CAZ strategic functions relative to new residential development in various locations within the CAZ.



Queen Elizabeth Street, Southwark

4.4.2 It is important to recognise that the relative weights attached to office and other strategic CAZ uses relative to residential accommodation in Table 1.1 (Categories B and C) does not mean that housing should be prohibited in the above areas. A mix of housing provision, together with other CAZ strategic uses and activities will be essential, not only to maintain the mixed use character of the CAZ, but also to address housing need and



Pimlico, Westminster

contribute towards meeting borough housing targets.

Consequently, boroughs should positively encourage additional housing provision within opportunity areas in the CAZ through mixed use development. However, in appropriate locations, boroughs should seek to ensure, where possible, that the balance of uses either within large mixed use development or at a neighbourhood level is weighted in favour of office or other CAZ strategic functions in the above locations. Strong support should be given to employment-led schemes and, in appropriate locations, mixed use development should be designed so that residential accommodation is supplementary to employment uses and complements existing or emerging strategic clusters of office and commercial activities.

- 4.4.3 In addition, it is important to consider the relative weight which should be given to retail functions within the CAZ when considering proposals for mixed use development, especially within internationally recognised retail centres (West End and Knightsbridge) and CAZ frontages<sup>109</sup>. Boroughs should ensure that the residential components of mixed use schemes complements and does not strategically constrain the retail offer in these locations. Similarly, within strategic cultural areas in the CAZ, boroughs should ensure residential accommodation is complementary to existing cultural, entertainment and evening activities, taking into account the guidance provided in Section 2 of this SPG.
- 4.4.4 Where residential-led proposals would result in the loss of office space within the CAZ, boroughs should seek a proportionate contribution to the provision of new office space, where there is evidence of local and strategic demand for office floorspace (Policy 4.3Bd). Replacement office floorspace should be delivered either within or nearby the development in order to sustain particular clusters of office uses



Southwark Street, Bankside

<sup>&</sup>lt;sup>109</sup> These are identified in identified Annex 2 and Map 2.3 of the London Plan

and support the overall balance and mix of uses within the CAZ. In determining the scope for on or off site office provision, there should be consideration of specific site circumstances, design and management requirements and development viability. Where the reprovision of office floorspace off-site is considered appropriate, this should be delivered within the CAZ in order to support the strategic office function of the Zone and sustain the agglomeration of employment related activities. Off-site office provision should be located in a suitable alternative location nearby and its delivery should be secured robustly through planning obligations. Financial contributions towards office provision secured through Policy 4.3Bd of the London Plan should only be accepted where: (a) on-site reprovision through mixed use development is not achievable; and (b) where there are no available or suitable alternative sites for off-site provision. Financial contributions should be ring-fenced and spent on the delivery of replacement office floorspace provision.

#### 4.5 Optimising housing output

- 4.5.1 As a general principle, where boroughs straddle the CAZ boundary, they should seek to relieve potential pressures on the core commercial, cultural and entertainment areas of the CAZ by fully realising the potential for additional housing capacity outside the CAZ boundary, within inner London and, where appropriate, in 'CAZ fringe' locations<sup>110</sup>. In doing so, CAZ boroughs should positively guide additional housing capacity towards the types of locations identified in Policy 3.3E of the London Plan that are considered suitable for higher density, residential-led, mixed use redevelopment including transport nodes, town centres, opportunity areas and surplus industrial, commercial and public land. As highlighted in the Housing SPG, residential densities on large sites and in opportunity areas, transport nodes and town centres may exceed the relevant density range in robustly justified circumstances, providing schemes achieve high quality design and can be supported in terms of existing or planned infrastructure capacity. It should be recognised that optimising housing output means taking into account the range of design principles set out in chapter seven of the London Plan. This includes having regard to local character and heritage assets and securing high quality architecture and a good public realm.
- 4.5.2 In addition, CAZ boroughs should also rigorously examine the potential for additional housing through the sensitive intensification and renewal of existing residential areas. This should be achieved by optimising potential housing output on small sites, especially where there is good accessibility, and by positively encouraging well-designed infill development. Boroughs should



King's Cross Opportunity Area

<sup>&</sup>lt;sup>110</sup> Inner London locations just outside the CAZ

also work proactively to bring forward additional housing provision through comprehensive estate renewal schemes, where this would enhance residential and environmental quality and increase the mix and overall provision of housing in a location. Delivering comprehensive redevelopment on surplus brownfield land in inner London and CAZ fringe locations may necessitate boroughs to take a proactive approach to land assembly and to maximise the use of public land, working closely with the private sector. As recognised in the Housing SPG, higher density housing provision in mixed use developments may be particularly suitable to smaller households. In light of this, boroughs should consider applying local policies on unit mix flexibly to higher density and mixed use schemes within accessible locations in the CAZ.

#### 4.6 Student Housing

- 4.6.1 As well as meeting national and more local education needs, London's higher education sector is an important element in the capital's offer as a world city and makes an important contribution to its economy<sup>111</sup>. A substantial proportion of overall net student housing units across London has been delivered in the CAZ (roughly 30 per cent)<sup>112</sup>, which reflects the fact that nearly 60 per cent of London's universities are located within the Zone. The current pipeline of approved student housing units within the CAZ (over 6,500 units) suggests this trend is likely to continue over the short to medium term.
- 4.6.2 London Plan Policy 3.8Bh requires boroughs to address strategic and local requirements for student housing without compromising the capacity for conventional housing. This is of particular relevance within the CAZ, taking into account the concentration of universities and student accommodation within central areas. In addressing this requirement, CAZ boroughs should consider: the overall strategic requirement for student housing in London; the approved strategic and local pipeline of student units; the available capacity to meet conventional housing need; the need to encourage more dispersed pattern of student accommodation; and the need to secure more accommodation that is affordable for students<sup>113</sup>.

#### 4.7 Mixed and balanced communities

4.7.1 Policy 3.9 of the London Plan promotes mixed and balanced communities across London in terms of tenure and household income in new developments and across London as a whole, in order to foster social diversity and to address social exclusion. This is supported by policies which seek to increase housing choice (3.8), maximise affordable housing delivery (3.11-3.12), and ensure equal life chances (3.1). From an economic perspective, it is important to accommodate a broad range of housing provision within the CAZ that is affordable to a variety of

<sup>&</sup>lt;sup>111</sup> PA Consulting Group. Study London. The economic impact of international students to London's economy: a quantitative perspective. PA Consulting, 2011

<sup>&</sup>lt;sup>112</sup> London Development Database statistics for financial years 2004 to 2013

<sup>&</sup>lt;sup>113</sup> Mayor of London, Housing SPG 2015, paragraphs 1.2.50-1.2.52

households on different incomes. In this context, it is important to consider the particularly high residential values found within the CAZ and wide variations in the types of jobs undertaken in central London. The London Plan recognises that London's economic growth depends heavily on an efficient labour market and this in turn requires adequate housing provision to sustain it 114.

- 4.7.2 In line with Policy 3.12C, affordable housing should normally be provided on-site. Off- site provision through land use swaps or payments in lieu should only be accepted in exceptional circumstances where it can be robustly justified that: on-site provision would not be appropriate in terms of the policies in the Plan and that provision off-site would: secure higher levels of provision; better address priority needs; secure more mixed and balanced communities; and better sustain strategically important clusters of economic activities in the CAZ<sup>115</sup>. Where, in exceptional circumstances, off-site provision is considered acceptable, the scope for a scheme to deliver some units on-site and some off-site should be fully explored. The delivery of units in off-site locations should support the London Plan's promotion of mixed and balanced communities and consideration should be given to existing levels of deprivation and concentrations of housing tenures in a location when determining the tenure mix of affordable housing provision, taking into account affordable housing requirements and the need to maximise affordable housing provision (Policy 3.11).
- 4.7.3 Boroughs, developers and providers are encouraged to develop and consider innovative forms of intermediate housing which meet the needs of eligible households and are viable in London and meet the definitions of affordable housing set out in the London Plan<sup>116</sup> and the NPPF<sup>117</sup>. Whilst, to date, shared ownership products have made up the bulk of London's intermediate offer, this does not mean that boroughs, developers and providers should be restricted to shared ownership. For example, intermediate/discounted market rent could play a greater role in meeting the needs of Londoners in the future, as could other products that are emerging, including rent to save products. It should be noted that, based on the NPPF definition, intermediate products can be delivered by a wide range of providers, not only registered providers and local authorities.
- 4.7.4 The London Plan and further guidance in the Housing SPG highlight the important role of the build to rent sector in meeting housing need and supporting labour market mobility. In line with the SPG<sup>118</sup>, boroughs should recognise the distinct economics of long-term, covenanted, build to rent schemes and should consider applying policies on unit size mix flexibly to higher density schemes within or on the edge of town centres and transport nodes. New and emerging non-conventional housing products, including proposals for shared

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<sup>&</sup>lt;sup>114</sup> Mayor of London, London Plan, 2015, GLA, Paragraph 4.15

<sup>&</sup>lt;sup>115</sup> Mayor of London, London Plan, 2015, GLA, Policy 3.12C and paragraph 3.74

<sup>&</sup>lt;sup>116</sup> Mayor of London, London Plan, 2015, GLA, Policy 3.10 and paragraph 3.61

<sup>&</sup>lt;sup>117</sup> Department of Communities and Local Government, National Planning Policy Framework, 2012, DCLG, Glossary, Annex 2

<sup>&</sup>lt;sup>118</sup> Mayor of London, Housing SPG, page 97-99

rented accommodation can play an important role in meeting particular housing requirements where they are of a high quality and are well-designed.

#### 4.8 Social infrastructure

4.8.1 London Plan Policy 2.12 requires boroughs to work with social infrastructure providers to meet the needs of both local residents and the large numbers of visitors and workers, recognising the unique circumstances of the CAZ. Concentrations of business, office and retail floorspace activities in particular areas of the CAZ can generate a range of social infrastructure requirements, particularly in terms of child



care provision, health and social care facilities and indoor sports and leisure facilities, for example gymnasiums and swimming pools.

4.8.2 Boroughs should consider potential social infrastructure demands generated by commercial and mixed use areas within the CAZ when undertaking social infrastructure need assessments. Social infrastructure provision should support a growing and changing population (Policy 3.16) and take into account existing and projected daytime populations resulting from office, employment and retail activities. This should be a particularly important consideration in areas which are likely to accommodate major mixed use development, including opportunity areas, recognising the potential for these locations to generate additional social infrastructure demands and support additional investment in social infrastructure provision (Policy 3.16E). Further general guidance is provided in the Mayor's Social Infrastructure SPG.

#### 4.9 Empty homes

4.9.1 Official DCLG statistics<sup>119</sup> show that the number of long-term vacant homes has been reduced in most CAZ boroughs over the past 10 years. Vacancy across London is also at an all-time low, with the number of long-term vacant homes in London having halved since 2004. However, there is a perception that new build dwellings and existing homes in particular areas of prime London are being purchased as so-called 'buy to leave' investments and left empty. This perception may be fuelled by the high proportion of new build properties being purchased by overseas buyers in prime London<sup>120</sup>. However, research shows the majority of new build properties sold to international purchasers in prime London are either rented out or lived in as main residences.<sup>121</sup> To ensure new homes are marketed to Londoners in London before or at the same time as they are available to buyers from other countries, the Mayor has launched a new concordat which has been

<sup>&</sup>lt;sup>119</sup> DCLG Live Table 615: vacant dwellings by local authority district: England, from 2004

<sup>&</sup>lt;sup>120</sup> Savills Word Research, Spotlight: The world in London – capital appreciation, 2013, Uk Savills

<sup>121</sup> Savills Word Research, Spotlight: The world in London – capital appreciation, 2013, Uk Savills

- signed by over 50 developers<sup>122</sup>.
- 4.9.2 Policy 3.14D requires boroughs to promote efficient use of the existing stock of homes by reducing the number of vacant homes, particularly long-term vacants<sup>123</sup>, by taking measures to bring properties back into use and through setting and monitoring targets. At a strategic level, the Mayor's Housing Strategy sets out a strategic aim that no more than 1 per cent of homes in London should remain empty for longer than 6 months. Bringing vacant properties back into residential use can contribute to meeting London Plan housing supply targets, though boroughs should avoid double-counting, in line with national planning guidance<sup>124</sup>. In addition, New Homes Bonus funding can be secured when vacant properties are brought back into use.
- 4.9.3 A number of CAZ boroughs have explored the potential to restrict vacancy on new build development through planning obligations, which would require units to be occupied for a minimum period. In doing so, boroughs should satisfy themselves that they have robust local evidence to demonstrate levels of vacancy in new build developments are a particular issue. Boroughs should also consider the potential impact of legal agreements on the delivery of residential development and ensure that obligations or conditions would meet the tests set out in the NPPF<sup>125</sup>.

#### 4.10 Short term lettings

- 4.10.1 Legislative changes<sup>126</sup> now mean householders may let out their properties for temporary sleeping accommodation for up to 90 days of the year without the need for planning permission, where previously planning permission was required<sup>127</sup>. It is recognised that the potential impact of these changes may be a particular issue within the CAZ, given close proximity to London's most significant cultural, entertainment and tourist attractions. Short term lettings undertaken on a permanent basis would result in the loss of permanent housing and could give rise to residential amenity issues and would necessitate targeted enforcement action.
- 4.10.2 Whilst the legislative context for applying Policy 3.14C of the London Plan has now changed, the core principle to prevent the loss of permanent housing to short-term lettings should be followed where short-term lettings are undertaken on a full-time commercial basis. Under the Deregulation Act, householders do not need to inform their local authority that they are letting out their properties on a short-term basis, so it may be difficult in practice for boroughs to monitor lettings and manage potential housing loss. However, boroughs may apply to the Secretary of State to exempt particular areas or residential premises from these reforms, for example where there are particular residential amenity issues.

<sup>&</sup>lt;sup>122</sup> Mayor of London, Mayoral Concordat on new homes for Londoners, GLA, 2014

<sup>123</sup> Homes which are vacant for over 6 months

<sup>&</sup>lt;sup>124</sup> DCLG, Planning Practice Guidance, Paragraph: 040 Reference ID: 3-040-20140306

<sup>&</sup>lt;sup>125</sup> DCLG, National Planning Policy Framework, paragraphs 203 to 206

<sup>&</sup>lt;sup>126</sup> Clause 44 of the Deregulation Act 2015

<sup>&</sup>lt;sup>127</sup> Section 25 of the Greater London Council (General Powers) Act 1973



## **SECTION 5:**

# TRANSPORT, MOVEMENT AND INFRASTUCTURE

#### 5.1 Introduction

- 5.1.1 Central London is one of the most connected places in the world. The rail, underground, road, bus, river, walking and cycle networks facilitate around 3.5 million trips to, from and within the central London boroughs on a daily basis<sup>128</sup>. Around 90 per cent of trips to the CAZ in the morning peak are made by public transport modes and rail-based transport accommodates 80 per cent of the 1.2m trips to the CAZ in the morning peak. <sup>129</sup>
- 5.1.2 Walking is a significant part of this connectivity as it is the most sustainable way to distribute commuters from transport interchanges: all trips to the CAZ will involve a pedestrian stage at some point, and around 90 per cent of trips under 1 mile originating in the CAZ are conducted on foot<sup>130</sup>. Cycling is also essential to this mix of modes if the CAZ is to accommodate further significant growth.

#### 5.2 Public transport in the CAZ

#### Rail and Underground

- 5.2.1 The existing availability of public transport in the CAZ is widespread, high frequency and high capacity. The transport connectivity and capacity provided by the radial rail network and TfL rail services within London play a primary role in facilitating employment in the CAZ. These networks provide the CAZ with a huge labour market catchment across London<sup>131</sup> and beyond<sup>132</sup> and drive the agglomeration economics (see paragraph 1.1.3) that benefit businesses there, allowing it to play its unique economic role within the UK.
- 5.2.2 There have been significant increases in rail and tube transport capacity into the CAZ, and the completion of Crossrail in 2018/19 will increase the rail capacity in London by around 10 per cent. Crossrail and the Thameslink programme will also significantly increase the number of people within 45 minutes' travel time of central London, improving the overall labour force market and competitiveness of businesses operating in London.
- 5.2.3 Further investment in strategic transport infrastructure is necessary to support the growth and success of the CAZ and in particular Crossrail 2. Areas can be intensified and expanded through transport improvements the key criteria being the 'effective density' of employment/development (the proximity of people in the catchment area in terms of time rather than distance) and the feasibility and cost of providing the necessary level of capacity and connectivity.

<sup>128</sup> Travel in London 7, TfL (2014),

<sup>129</sup> Travel in London Supplementary Report 1 (2014) TfL's Central London Peak Count (CAPC),

<sup>130</sup> London Travel Demand Survey 2011/12 to 2013/14

<sup>131</sup> See Figure 6.5 in Section 6.7

<sup>&</sup>lt;sup>132</sup> Of the approximately 1.1 million people employed in the Cities of Westminster and London in 2011, 241,000 were non-London residents (Census travel to work data). See also Figure 6.6 in Section 6.7

- 5.2.4 A visual presentation of major public transport infrastructure schemes committed and future opportunities is illustrated in Figure 5.1. In addition, investment in London Underground upgrades include: planned higher frequencies on the Victoria, Jubilee and Northern lines; new higher-capacity trains proposed for the Piccadilly and Bakerloo lines; and implementation of the Night Tube<sup>133</sup>. Beyond the current Underground investment programme there will be few opportunities for realising significant further additional capacity on the existing system within Central London and new tunnelled capacity will be required, starting with Crossrail 2.
- 5.2.5 Demand at stations in the CAZ is often higher than elsewhere in London, and pressures on them to disperse commuters quickly and efficiently will continue to grow as population and employment rises. TfL has a long term investment programme to upgrade stations aimed at increasing capacity, public realm, improving interchange and enhancing the customer experience.
- 5.2.6 Major underground station upgrades in the CAZ include: Bank, Bond Street, Elephant and Castle, Holborn, Tottenham Court Road and Victoria. New ticket halls, entrances, additional escalators and new interchange routes all form the package of measures that will boost capacity and quality of these stations. At Bond Street and Tottenham Court Road new Crossrail interchanges will be available, while at Victoria key drivers are the need to improve interchange and the urban realm. A new ticket hall at Elephant and Castle will complement the removal of the roundabout and redevelopment of the shopping centre, and improvements to Bank station will ensure that this key interchange will be fit for the future.

<sup>133</sup> https://tfl.gov.uk/campaign/tube-improvements/the-future-of-the-tube/night-tube?intcmp=22069

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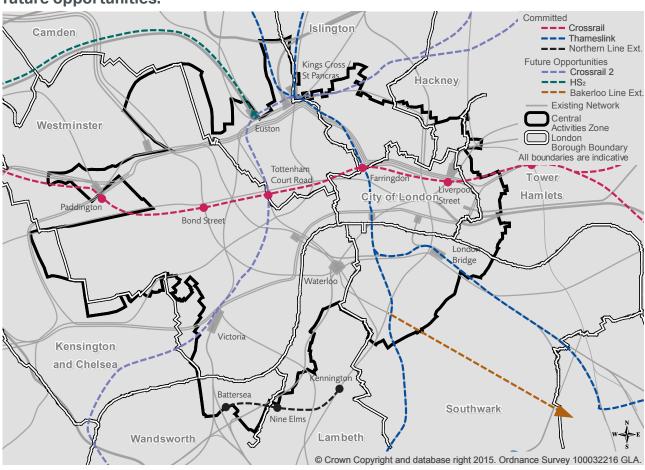


Figure 5.1 Major public transport infrastructure including schemes committed and future opportunities.

#### **Buses**

- 5.2.7 Buses have the highest level of efficiency of road space use of any surface mode of transport in London. To facilitate the existing high mode share for buses in London as well as to allow the network to grow, space for 'bus standing' is essential for the reliable operation of the network. However, this has become increasingly constrained in central London as scarce highway space is used for competing needs. Where possible, bus standing should be provided in appropriate locations for maximum reliability and flexibility of the bus network, and include means to physically turn buses around.
- 5.2.8 As part of changes to the highway network (such as removal of gyratories and/ or junction enhancements), opportunities to improve and rationalise bus routes and stopping arrangements should be explored in collaboration with TfL. Bus priority measures (including bus lanes and bus-only roads/turns), simple road layouts allowing two-way operation and sufficient height clearances<sup>134</sup> should be considered.
- 5.2.9 Other measures include maximising bus stop accessibility, improving interchange

<sup>&</sup>lt;sup>134</sup> Including height clearance to allow double deck buses to run (4420mm)

- between transport modes, including walking routes, and ensuring buses can access key destinations directly.
- 5.2.10 Development may require additional capacity or new links to be provided on the bus network. TfL will continue to seek sponsorship funding to pump-prime bus service improvements, which would usually be delivered via s106.

#### **Taxis and Private Hire**

5.2.11 Taxis and private hire vehicles (PHVs) provide a valuable complement to the high levels of public transport, walking and cycling in the CAZ. The volume of taxis and PHVs should be balanced carefully against wider transport objectives such as relieving congestion,



improving air quality and encouraging the use of active and space efficient modes.

5.2.12 Designated taxi ranks are an important part of this network, providing space for taxis to stop and be available for hire, and could be considered as part of new developments including new hotel and tourist developments. More information can be found in the TfL Ranks Action Plan<sup>135</sup>. All taxis are required to be wheelchair accessible and have a number of other accessibility features. This provides an alternative mode of travel for disabled people some of whom may be reliant upon taxis and PHVs to travel door to door. Taxi and private hire arrangements can be discussed with TfL's Taxi and Private Hire Team.

#### Coaches

- 5.2.13 There are a number of distinct coach issues which bear on the CAZ. Coach travel to and from central London provides an affordable alternative to other modes available to people from destinations across the UK and abroad. Dedicated Pickup and Set-down (PUSD) facilities in central London are generally located in close proximity to tourist attractions, theatres and hotels. However, there is growing pressure on the availability of coach parking caused by redevelopment of parking facilities, new infrastructure developments and urban realm schemes, leading to coach congestion particularly throughout the summer peak season.
- 5.2.14 Planning policies should take account of coach requirements in the CAZ, particularly around major tourist attractions, theatres and hotels. TfL provide a map of coach parking and provide support and guidance to drivers<sup>136</sup>.

<sup>135</sup> available from http://www.tfl.gov.uk/tph

<sup>136</sup> https://tfl.gov.uk/info-for/coach-drivers/ TfL Coach Parking Map

- 5.2.15 Local authorities and developers should work with TfL to identify coach stops for scheduled domestic services with safe and sufficient capacity for service expansion in key business areas within the CAZ and north of the Isle of Dogs. It is also important to identify parking bays for tourist services.
- 5.2.16 Victoria Coach Station is over 80 years old and since it was first used as a site for coach travel, the number of customers and the nature of the industry has changed dramatically. Over 14 million people currently use the station each year and TfL is considering how it can best meet their needs.

#### The Blue Ribbon Network and River Services

- 5.2.17 The River Thames is one of the defining features of central London. It also provides a transport network which offers a world famous skyline and fast and frequent 'River Bus' services alongside 'River Tour' sightseeing services, as well as freight services. The importance of the Blue Ribbon network is reflected in the London Plan (policies 7.24 to 7.30) and Mayor's Transport Strategy (Proposals 36-38).
- 5.2.18 London Plan policy 7.25 promotes the use of London's waterways for transporting passengers and for tourism. Improved facilities should be supported, particularly in the central stretch of the River Thames.
- 5.2.19 Plans for the extension of piers at Westminster, Embankment and Bankside are underway. There is also potential to bring Wapping Pier back into use as a river bus stop. TfL is also considering the feasibility of the re-development of Festival Pier, including increasing its size and capacity. Blackfriars Pier is being moved as part of development of Thames Tideway Tunnel. See Figure 5.2 for the location of these piers.
- 5.2.20 Developments in the CAZ should protect existing facilities for waterborne passenger, tourist and freight traffic (London Plan policies 7.25 and 7.26). The Mayor supports increased growth in use of the Thames which maximises connectivity and integration with other transport modes particularly walking and cycling. The Mayor's River Action Plan commits to installing new cycle hire docking stations near to piers as well as more cycle parking and Legible London Wayfinding totems in and around piers.
- 5.2.21 Where applicable, planning policies in CAZ should seek to:
  - Protect and improve existing access points to or alongside the Blue Ribbon Network in CAZ (London Plan policy 7.27)
  - Improve existing pier infrastructure and facilitate interchange with other modes including cycling, walking, buses, London Underground and Rail (this could include the provision of cycle parking or new signage)
  - Progress proposals for river crossings such as the proposed Garden Bridge,
     Nine Elms crossing, Silvertown Tunnel and the Rotherhithe to Canary Wharf

crossing and maximise the benefits of these crossings while taking account of impacts on the streetscape, environment and activities that occur on the river.

Figure 5.2: Location of piers with proposed improvements in Central London



Source: Transport for London



St George Wharf Pier

#### Improved interchange

- 5.2.22 Improved public transport interchange is an important element of ensuring better integration of central London's public transport. Integration is about making public transport more attractive to existing and potential passengers and about how the transport system, including interchanges, can contribute to the achievement of broader economic, social, and environmental objectives.
- 5.2.23 When designing developments at or near to interchanges, consideration should be given as to the best way of integrating public transport, walking and cycling. This could include the introduction of cycle parking or larger 'hubs' particularly near rail termini improved public realm and space for walking, as well as the design of stations and the surrounding environment. TfL's 2015 Station Public Realm Guidance<sup>137</sup> sets out the preferred approach for improving station public realm.

#### 5.3 Relationship between public transport and development

5.3.1 The high levels of public transport connectivity in the CAZ (see Figure 5.3) support the close integration of transport and development (London Plan policy 6.1). The scope to accommodate growth in CAZ through sensitive intensification and high density development should be explored having regard to the connectivity and capacity of lines and stations as well as place-making, design and heritage policies in chapter 7 of the London Plan, guidance in section 3 of this SPG and planning frameworks for the CAZ Opportunity Areas.

#### Development and transport impacts and mitigation

5.3.2 To ensure that the competitiveness of the CAZ is sustained, it is necessary for any development to provide the necessary transport improvements to facilitate the development and mitigate against any transport impacts. The Mayor and Transport for London (TfL) will work with local authorities to ensure that the necessary transport improvements and benefits can be derived from planning obligations and CIL.

<sup>&</sup>lt;sup>137</sup> TfL (2015), Station public realm guidance. https://tfl.gov.uk/cdn/static/cms/documents/station- public-realm-design-guidance.pdf

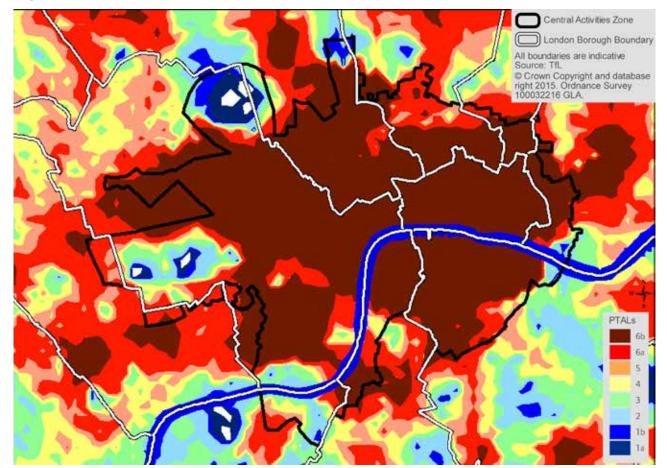


Figure 5.3: Future 2021 Public Transport Accessibility Levels (PTAL) in CAZ

#### 5.4 The role of sustainable transport in the CAZ

- 5.4.1 Morning peak travel into the CAZ is predominantly by public transport, with around 90 per cent of journeys made by bus, rail, or Underground. However, movement within the CAZ is dominated by a large number of short journeys (particularly walking) and the permeability and quality of the urban environment plays an important part in sustaining and increasing this number.
- 5.4.2 Walking and cycling play a prominent role in facilitating movement throughout the CAZ and northern Isle of Dogs, and are important for achieving multiple objectives around transport, public health, quality of life and environmental quality. They also contribute to liveability, which influences the economic vitality and competitiveness of places.
- 5.4.3 Street environments have a significant impact on health which can be positive or negative. Streets should be healthy places that maximise the potential for improving health and minimise health inequalities (London Plan Policy 3.2). A helpful framework for ensuring the best performance of streets is through the Healthy Streets approach (see Figure 5.4).

- 5.4.4 Central London has extremely high levels of pedestrian activity. Over 100,000 walking trips are made along the busiest point on Oxford Street everyday and 80 per cent of onward journeys from Cannon Street rail station are made on foot. On average over 230,000 people per day cross the Thames on foot within the CAZ. Levels of walking within the CAZ are likely to increase significantly as a result of Crossrail and other planned investment in the public transport network.
- 5.4.5 Increasing the levels of walking and cycling in the CAZ will release capacity on public transport, reduce the dominance of streets by motor vehicles and create streets that are better, healthier places to be. Investment in Cycle Superhighways, Quietway routes and the Central London Cycle Grid, along with junctions with improved cycling facilities and pedestrian enhancements, are all being delivered to achieve this.
- 5.4.6 Development in the CAZ should deliver positive benefits for pedestrians<sup>138</sup> and cyclists<sup>139</sup>, improving connectivity and permeability and enhancing the quality of the public realm.

<sup>&</sup>lt;sup>138</sup> See Tfl. Pedestrian Safety Action Plan (2014) and forthcoming Draft London Pedestrian Design Guidance (to be published late 2015)

<sup>139</sup> See TfL: revised Cycle Safety Action Plan (2014) and London Cycling Design Standards (2014)

#### Figure 5.4: Healthy Streets

Healthy Streets identifies ten factors that should be considered in any new development (see figure below). These factors should be applied ambitiously in the CAZ given the particular importance of its public realm for both 'movement' and 'place' functions set out in the Mayor's Roads Task Force (RTF) Report\*.

The Healthy Streets approach is universally applicable to all Roads Taskforce Street Types. The nine 'Street Types' set out in the RTF should be planned with consideration given to both local needs and wider network performance. This should enable a more appropriate balance between 'movement' and 'place', improving the ways in which streets function for all users and activities that take place on them.

More details of the approach are set out in TfL's health policy 'Improving the health of Londoners: transport action plan' and in Chapter 9 of the TfL 'Travel in London: Report 7'.



<sup>#</sup> RTF (2013) Roads Task Force Report – The vision and direction for London's streets and roads.

travel-in-london-report-7.pdf

<sup>\*</sup> TfL (2014), Improving the Health of Londoners: Transport Action Plan. Transport for London. <a href="https://tfl.gov.uk/cdn/static/cms/documents/improving-the-health-of-londoners-transport-action-plan.pdf">https://tfl.gov.uk/cdn/static/cms/documents/improving-the-health-of-londoners-transport-action-plan.pdf</a>
^ TfL (2014), Travel in London: Report 7. Transport for London. <a href="https://tfl.gov.uk/cdn/static/cms/documents/">https://tfl.gov.uk/cdn/static/cms/documents/</a>

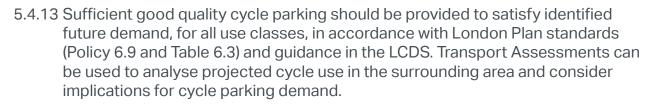
#### Planning for increased cycling in the CAZ

- 5.4.7 Many parts of the CAZ already have substantial numbers of cyclists using the streets. In a 2013 TfL survey<sup>140</sup> across the majority of the CAZ, the average mode share for cycle traffic between 6am and 8pm in areas with full vehicular access was 16 per cent. This rose to 24 per cent in the morning peak and 22 per cent in the evening peak. Six of the top ten sites for cycle flow were Thames bridges. In many parts of the study area, cycles constituted the largest road-based mode during peak hours. While cycle mode share is high it is set to grow even further, with a large number of trips in central London (c.250,000 a day) quicker by bicycle when compared to other forms of transport<sup>141</sup>.
- 5.4.8 Central London boroughs play an important role in achieving the Mayor's ambition to increase cycling mode share in part because of the high number of commuting trips ending there but also because of the high profile and association given to cycling in the CAZ, including the majority of the Cycle Hire hubs.
- 5.4.9 To meet the growing demand for cycling in the CAZ, local authorities and applicants should therefore plan for this in area-wide and site-specific proposals. Significant investment is already being directed toward providing strategic and local links as part of the Mayor's Vision for Cycling. This includes the new Cycle Superhighways as well as locally important links including Quietways and the Central London Grid. This will facilitate a diverse range of trips to, from and within the CAZ. Boroughs and developers should discuss potential cycle infrastructure improvements with TfL at the earliest opportunity.
- 5.4.10 Local authorities and developers should consider the many different types of cycle in use, and assume greater diversity over time, as advised in the Accessible London SPG (2014). This includes designing for cargo cycles, handcycles and cycles adapted for use by people with mobility impairments. Infrastructure that can be used in safety and comfort by all cyclists, and parking facilities that can accommodate larger models of cycle, are an essential part of the future landscape for cycling in the CAZ.
- 5.4.11 Developments in central London could look to part-fund Quietway and Grid routes which could help enhance and unlock development potential themselves. Streets should generally be designed to be cycle-friendly and local authorities are encouraged to work with partners and TfL to implement the 'London Cycle Design Standards' (LCDS). The 'Cycling Level of Service Assessment' can be used in order to identify aspects of cycle provision that need improvement, plan appropriate interventions, appraise different options and monitor the performance of schemes post-implementation.

<sup>&</sup>lt;sup>140</sup> TfL, Central London Cycle Census, Technical Note, October 2013

<sup>&</sup>lt;sup>141</sup> TfL (2010), Analysis of Cycling Potential

- 5.4.12 TfL will, and local authorities are encouraged to, create better, safer conditions for cycling across the CAZ by:
  - delivering a coherent, safe, direct and consistent cycle route network throughout the CAZ;
  - maximising cycle access and permeability,
  - ensuring cyclists have route choice within the local network;
  - keeping vehicular speeds low; tackling problematic or unsafe junctions and
  - dealing with severance caused by busier roads, which cyclists will seek to cross.



- 5.4.14 The CAZ has 340 Cycle Hire docking stations which represent 46 per cent of the total Cycle Hire network including many of the busiest stations. Each weekday morning, over a third of all Cycle Hire trips take place within CAZ. The most frequently travelled trips are within Hyde Park and from the major rail hubs of Waterloo, King's Cross and Liverpool Street to and from the City of London and the surrounding area. The CAZ is an essential area within the Cycle Hire network due to both commuter and tourist trips.
- of Cycle Hire and the constraint on cycle parking mean that further intensification of the Cycle Hire network in the CAZ should be considered. Increasing cycle hire docking point numbers through more and bigger stations helps to reduce the need for manual redistribution and increases availability of bikes and spaces, ultimately leading to a better service and more cycle journeys.





- 5.4.16 Local authorities, partners and developers are encouraged to work with TfL to:
  - ensure that Cycle Hire stations are plentiful and properly located;
  - incorporate new Cycle Hire docking stations into developments where current Cycle Hire usage is high; and
  - consider how contributions to the operational costs of the Cycle Hire network, can be funded via Section 106.

#### Promoting walking and improving the pedestrian experience

- 5.4.17 Walking is not just a form of transport. Demand for high quality streets and public spaces that support physical, social and economic activity will increase as London's population grows and changes.
- 5.4.18 While there has been substantial investment in the public realm throughout the CAZ in recent years, crowding remains an issue in many locations. Increases in pedestrian space will be required to improve pedestrian comfort and create public spaces for people to relax. This will ensure the CAZ remains an attractive destination for retail, leisure and employment. Improvements to Long Acre, the key walking route between Covent Garden and Holborn, achieved a footfall increase of 18 per cent. Likewise, redesigning the public space at Grant's Quay Wharf in the City of London led to a 34 per cent increase in pedestrians.
- 5.4.19 Local authorities, developers and partners are encouraged to provide additional and enhanced pedestrian space where possible. Innovative street design can encourage walking and create new public spaces and parks for example, the London Borough of Camden is converting Alfred Place, adjacent to Tottenham Court Road, into a new park for central London, demonstrating what is achievable within a significantly constrained environment (See Figure 5.5).

#### Figure 5.5: Forthcoming London Pedestrian Design Guidance (LPDG)

Boroughs, developers, land owners and other partners are encouraged to apply the LPDG whenever development creates streets or publicly accessible spaces and when there are impacts on existing streets and publicly accessible spaces:

- Incorporate the principles and standards set out in the London Pedestrian Design Guidance into local plans.
- Use Pedestrian Environment Review System (PERS)# audits to identify necessary improvements to the pedestrian environment and review design proposals.
- Assess pedestrian comfort levels, identify areas where pedestrian comfort falls below the recommended minimum level of B+ and develop proposals to increase the space available to pedestrians.
- Ensure suitable formal and informal crossings serving pedestrian desire lines and demand and that pedestrians can cross roads safely, directly and without undue delay.
- Consider the use of shared space on streets where pedestrian numbers are high and footway space limited, or where there is a need to provide space for active uses such as markets, food stalls or cafe seating.
- Develop policies for the temporary closure of streets for events and the temporary conversion of street space for alternative uses such as parklets.
- Determine key pedestrian desire lines, assess the quality of pedestrian provision on those routes and identify opportunities for improvement.
- Install Legible London (see Figure 56) as part of all street enhancement schemes, in areas with high footfall and on key pedestrian desire lines.
- Seek to reduce the dominance of motor vehicles through access restrictions, speed limit reductions and redesigning streets to reduce speeds.
- Enhance the pedestrian environment through the use of high quality materials, reducing clutter and improving accessibility.
- Provide adequate seating, including informal opportunities to sit and rest.

#### #https://tfl.gov.uk/cdn/static/cms/documents/pedestrian-environment-review-systemfactsheet.pdf

- 5.4.20 Similarly, where possible developments should help unlock 'missing links' in the pedestrian network. For instance, within the ancient block pattern of Soho, the courts and mews of Ham Yard and Denman Place had become obscured and at times closed to the public. Following approval in 2010, Ham Yard was rebuilt as a high quality shared space and Denman Place widened, lit and flanked by active uses. Junction improvements at Great Windmill Street and Legible London signage further reinforced the route as a 'new' walking route. This has improved permeability between key attractions of Rupert Street/Great Windmill Street and Piccadilly Circus, in an area of high pedestrian footfall.
- 5.4.21 The London Plan identifies a strategic Walk London Network which is promoted alongside borough routes (Policy 6.10Ca). To support the international, national and London-wide role of CAZ<sup>142</sup>, and particularly its economic and tourist

<sup>&</sup>lt;sup>142</sup> Policy 2.10 of the London Plan

functions, TfL and central London boroughs could consider whether this network could be developed further, complementing the Jubilee Walk and Thames Path with locally important walking routes in high footfall areas that link key destinations including transport nodes, interchanges and attractions.

#### 5.4.22 Local authorities, developers and partners are encouraged to:

- a) undertake PERS audits for any new scheme along a strategic walking route;
- b) implement the Pedestrian Comfort Guidance for London 2010 and/or Draft London Pedestrian Design Guidance 2015 (see Figure 5.5), to achieve a minimum Pedestrian Comfort Level of B+ for footpaths, B- for crossings and B/C for crossing islands;
- c) implement a consistent wayfinding strategy, such as Legible London (see Figure 5.6),
- d) simplify streetscapes and declutter (Policy 6.10A);
- e) provide access for all (Policy 6.10A);
- f) identify 'missing links' and suppressed pedestrian desire lines, and seek implementation of new pedestrian paths through planning policy;
- g) identify safety blackspots and implement improvements to pedestrian safety, such as subway removal;
- h) provide high quality crossing facilities, such as parallel, widened or diagonal pedestrian crossings in areas of significant suppressed demand.

#### Figure 5.6: Legible London

Legible London is a universal wayfinding system that is installed throughout the CAZ, with the exception of the City of London which has its own wayfinding system. TfL research shows that one in seven Londoners cannot find their way around the city easily and one in four worries about getting lost. Pedestrians also state they would walk more if there were better and more frequent signs. The installation of additional Legible London signage is encouraged to improve coverage within the CAZ.

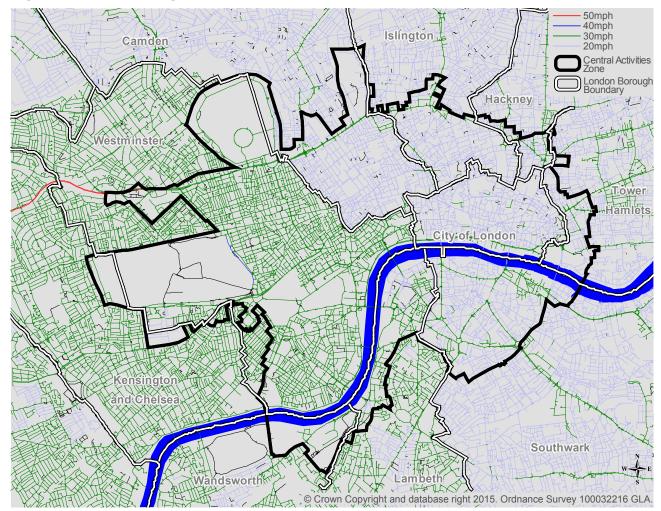
#### 5.5 Congestion, parking and freight servicing/loading

- 5.5.1 Whilst public transport, walking and cycling support the largest number of journeys taking place in the CAZ, roads continue to play an important part in moving goods and people around central London. Many central London road-based trips are particularly high value or time critical, with more than half of the vehicle kilometres in central London made by buses, freight vehicles or taxis, rather than by car.
- 5.5.2 The high pedestrian footfall and demand for cycling and bus trips in the CAZ means much of the road network has different priorities to locations outside of the CAZ and town centres. In the 2013 Roads Task Force (RTF) report, congestion

in central London was forecast to increase 60 per cent by 2031 compared to 2007 levels. This breaks down into a 20 per cent increase as a result of population and employment growth and a 40 per cent increase due to meeting wide ranging priorities for the road network. This increase is higher than the 25 and 15 per cent increases forecast in inner and outer London respectively, despite central London only making up 3 per cent of motorised vehicle kilometres in the Capital.

- 5.5.3 Beyond the initial reductions in traffic volumes associated with the introduction of the Congestion Charge in 2003, there has been a continuing decline in vehicle kilometres in central London.
- 5.5.4 Average traffic speeds in the CAZ hover around 15kph (9mph) during the morning, inter and evening peaks while average vehicle delay varies between roughly one and two minutes per vehicle kilometre<sup>143</sup>. However, speeds in some parts of the CAZ (see figure 5.7) exceed 20mph despite accommodating high volumes of pedestrians and cyclists.

Figure 5.7: London digital road speed limit map



<sup>143 155</sup> Travel in London 7, Transport for London, 2014)

- 5.5.5 Slower speeds are appropriate at a number of types of locations, including at city hubs/boulevards and city streets where movement is clearly important but place should take more precedence than it has historically. Locations such as King's Cross and Tottenham Court Road are good examples where place enhancements are needed to improve the experience of all road users.
- 5.5.6 The Mayor and TfL have long supported 20mph speed limits and have facilitated their introduction through the Mayor's Local Implementation Plan funding to boroughs. Almost 25 per cent of all London roads are now 20mph and TfL has identified around 50km of its road network which could potentially be appropriate for 20mph speed limits, some of which is located in the CAZ. Routes identified include Westminster Bridge to Southwark Street (connecting Westminster and London Bridge), Upper Street, King's Cross and Farringdon Road. Reducing traffic speeds will reduce casualties, increase the numbers of people using active travel and enhance communities and TfL will seek to identify further places in the CAZ appropriate for slower speeds.
- 5.5.7 Due to the very high 'place' function of the majority of the CAZ, there are few places where 20mph is inappropriate, and these should be treated as exceptions. Slower speeds should form part of a package of measures to improve the place, function and safety of roads and are not an end in themselves.

#### Car parking in the CAZ

- 5.5.8 The Mayor's restraint-based approach to parking in London where public transport is good<sup>145</sup> is especially important in the CAZ, to ensure that limited, high value land is used efficiently to support the spectrum of CAZ activities. In light of this approach, car-free developments should be promoted throughout the CAZ. Guidance for Blue Badge parking and provision for electric vehicles, car clubs and operational spaces is set out in the maximum standards in the London Plan.
- 5.5.9 In addition to residential car parking, non-operational parking at retail and business uses should also be constrained.

#### Freight delivery, loading and servicing in the CAZ

- 5.5.10 The CAZ provides a unique location where a large number of different activities are able to take place in a high density environment. Whilst much of this activity requires high quality public transport and/or urban realm to take place, there is also the need to ensure that businesses can receive the deliveries and services required to operate, increasingly out of peak periods.
- 5.5.11 Freight delivery, loading and servicing are vital to the effective operation of the CAZ, and the requirements are likely to increase further with the growth in

<sup>&</sup>lt;sup>144</sup> RTF (2013) Roads Task Force – Technical Note 14: Who travels by car in London and for what purposes? London: Transport for London

<sup>&</sup>lt;sup>145</sup> London Plan para 6.45

employment, housing, e-commerce and just in time delivery trends. Managing this will be important to keep the city both moving and functioning. Unless congestion is tackled businesses will face rising costs and reduced productivity, and bus passengers, drivers and freight will all face increasing delays.

- 5.5.12 Efficient access and the provision of loading and stopping facilities are important to the role of CAZ as a regional, national and international business hub.
- 5.5.13 The London Olympic and Paralympic Games demonstrated the effectiveness and value of freight management, particularly in central London, including reduction, retiming or rerouting operations during that period<sup>146</sup>.
- 5.5.14 The potential to upgrade parts of the network of 'locally significant' industrial sites which have the potential to facilitate warehousing to being 'strategic' sites will be a matter for the London Plan review. There may be a greater role for planning in freight, servicing and deliveries in and around the CAZ due to increased pressure on road space as London, and the way businesses and residents operate, continues to grow and change.
- 5.5.15 It is important to identify and protect opportunities for localised micro consolidation centres to support the CAZ. These would enable distribution via bike, walking or electric vehicles and local distribution provides a more reliable service to end consumers. The potential for consolidation of servicing for large buildings with multiple occupiers could also be considered.
- 5.5.16 There are many options for mitigating the impact of freight traffic that are not viable on a scheme by scheme basis but could work for a neighbourhood. These include:
  - minimising use of road for freight
  - contributing to congestion relief, safety and emissions improvements
  - supporting a switch to cleaner fuel sources for delivery and servicing vehicles
  - developing neighbourhood Delivery and Servicing Plans as a vehicle for supporting freight mitigation solutions not viable at a scheme level (such as consolidation service for a group of blocks)
  - ensuring opportunities for delivery
  - by rail, water and cycle are fully considered for both construction and operational phases providing alternative fuelling facilities as part of development
  - protecting sites that could be used as such
  - encouraging out-of-hours freight through timed, or flexible (shared) loading bays.

<sup>&</sup>lt;sup>146</sup> Travel in London Supplementary Report (2013), Olympic Legacy Monitoring: Adaptations to deliveries by businesses and freight operators during the Games

- 5.6 Providing safe facilities for pedestrians and cyclists during construction, deliveries and ongoing servicing
- 5.6.1 Ensuring pedestrian and cyclist safety during the construction stages and ongoing servicing and delivery requirements of buildings is of particular concern in the CAZ due to high levels of development (and subsequently construction traffic), the density of the urban fabric, as well as high levels of cycling and walking.
- 5.6.2 Between 2008 and 2013, 55 per cent of cyclist fatalities in London involved a heavy goods vehicle. A disproportionate number of these were construction vehicles. On 1st September 2015, the Mayor marked the launch of Britain's first Safer Lorry Scheme whereby vehicles of more than 3.5 tonnes entering London must now be fitted with sideguards to protect cyclists from being dragged under the wheels in the event of a collision, along with Class V and Class VI mirrors to give the driver a better view of cyclists and pedestrians.
- 5.6.3 In 2012 Transport for London commissioned an independent review of the construction sector's transport activities to understand the causes of these collisions and how they might be prevented: 'Construction Logistics and Cyclist Safety' (CLOCS) report. Local authorities and developers should seek to minimise road safety risks associated with construction traffic by encouraging best practice included in CLOCS (Construction Logistic and Cyclists Safety) and FORS (Freight Operator Recognition Scheme).
- 5.6.4 Guidance on temporary traffic management layouts that prioritise maintaining good quality cycle and pedestrian access should be followed across the CAZ. The main sources of guidance are: 'Safety at Street Works and Road Works: a Code of Practice', 'Traffic Signs Manual' chapter 8, Traffic Advisory Leaflet 15/99 'Cyclists at Roadworks', the London Cycling Design Standards and the (forthcoming) London Pedestrian Design Guidance.
- 5.6.5 Through S106 agreements or planning conditions, local authorities should require all HGV and Passenger Carrying Vehicle drivers and contractors involved in the construction and servicing of new development to undertake on- road cycle safety training and have appropriate safety devices fitted to their vehicles in accordance with the CLOCS and FORS best practice standards.
- 5.6.6 A number of supplementary guidance documents have been produced to assist those implementing the requirements of the CLOCS Standard for construction logistics:

#### **Construction Logistic and Cyclists Safety**

Standards and guidance of CLOCS should be taken into account in all construction activities. http://www.clocs.org.uk/

- 5.6.7 Construction traffic related to a development is likely to result in impacts on local amenity and local residents. This is particularly relevant to the CAZ due to high levels of development and high density of existing uses. The MTS (2010) promotes the adoption of Construction Logistic Plans (CLPs) that recognise efficiency, and environmental and safety benefits. The London Freight Plan highlights the important role of the movement of goods in supporting the future growth of London's economy whilst recognising that such transport can have negative impacts on the local environment.
- 5.6.8 CLPs along with transport assessments, travel plans and DSPs, are key documents that support the aims of the London Freight Plan. CLPs can help to limit negative transport and environmental impacts associated with the construction stage and ongoing deliveries and they can also help address temporary disruption/severance of highway links needed during development.
- 5.6.9 TfL has developed guidance on CLPs for both local authorities and developers to support sustainable construction practices in London:

#### **Construction Logistic Plans (CLP) guidance**

<u>For developers</u>: http://www.tfl.gov.uk/cdn/static/cms/documents/constructionlogistics-plan-guidance-for-developers.pdf

<u>For planners:</u> https://www.tfl.gov.uk/cdn/static/cms/documents/construction-logistics-plan-guidance-for-planners.pdf

#### 5.7 Guidance on other infrastructure

#### Connectivity

- 5.7.1 The London Plan promotes competitive connectivity through policy 4.11.

  Densities, in particular of commercial development, are high within the CAZ.

  Therefore, where necessary, developers should seek to aggregate demand in areas not currently served with high-speed connectivity and liaise jointly with providers to ensure that provision is delivered prior to completion.
- 5.7.2 Developers and land/property owners should be encouraged to consider communal access arrangements to connectivity infrastructure to allow for maintenance and upgrades as part of proposals, particularly in supporting Central London Forward's emerging work on standardised wayleave access agreements. Issues to overcome in delivering improved connectivity, include the need for new transmitting equipment on street furniture, the potential impact on heritage assets and sub-pavement cable congestion.
- 5.7.3 Developers should make clear whether high-speed broadband is available within the development, and the choice of providers and/or technologies available.

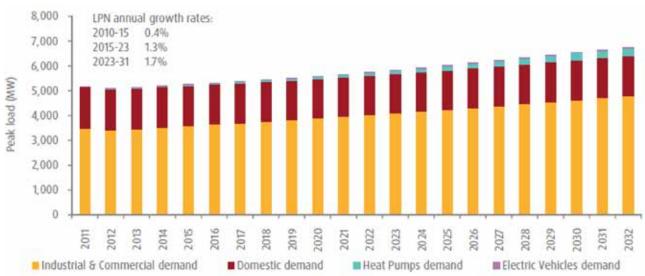
  Developers should also consider obtaining a technical assessment and advice

through the Connectivity Rating Scheme<sup>147</sup> which applies only to commercial development.

#### **Energy - Infrastructure**

- 5.7.4 As the CAZ's economy and have grown so has its demand for energy. The demand for electricity is particularly intense with large offices having a significant impact on the electricity infrastructure in the CAZ. UK Power Networks predicts that London will experience an annual 1.3 per cent increase in electricity demand up to 2023 and a further 1.7 per cent increase in demand between 2023 and 2031<sup>148</sup>
- 5.7.5 The current regulatory system does not encourage strategic investment in electricity infrastructure ahead of need. This can lead to delays during the construction of schemes, especially where a significant amount of development has already occurred in an area, taking up the capacity in the electricity network.
- 5.7.6 This is also set out in London Plan policy 5.4A. Developers are strongly advised to engage with the local power distribution company, UK Power Networks (UKPN) at the earliest stage possible to discuss connection to the electricity grid. This will enable the developer to take into account any potential time delays and additional costs arising from connection to the electricity grid. To support the efficient and effective provision of energy infrastructure the Mayor is working with Government, the regulator and the industry to improve current regulation to ensure infrastructure can be provided in time for development to connect to the grid without delay.

Figure 5.8 UKPN's predicted peak load growth for London\*



# UKPN. London Power Networks Business Plan (2015 to 2023). 2014

<sup>&</sup>lt;sup>147</sup> More information can be found at http:// wiredscore.london

<sup>&</sup>lt;sup>148</sup> London Power Networks Business Plan (2015 to 2023) Executive summary March 2014

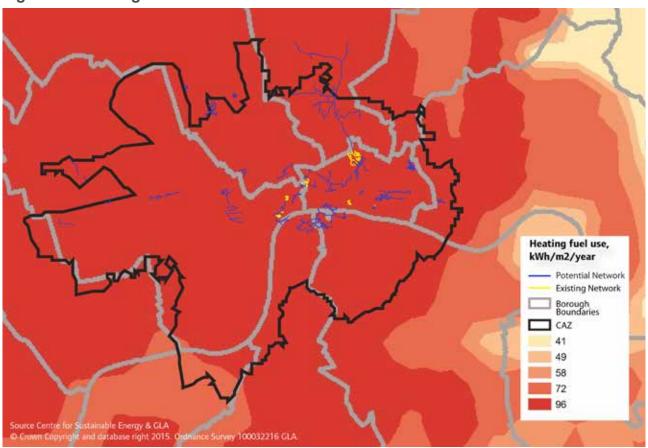
5.7.7 In addition, following the publication of his London Infrastructure Plan, the Mayor is producing the London Energy Plan. This will be a tool to project London's energy demand at a local level based on population and employment growth. It will also identify areas already under stress and therefore likely to need further investment in the local electricity grid, demand management and promoting local low carbon energy supplies. Boroughs are encouraged to use the findings of this study to inform their Local Plans. The London Energy Plan is likely to be completed by the end of 2015.

#### Decentralised energy and heat networks

- 5.7.8 To support the provision of energy infrastructure, the London Plan (policies 5.5 and 5.6) strongly encourages the development of heat networks. Heat networks carry heat to buildings and can be supplied by a range of energy production technologies utilising different sources of energy including local resources. The energy production plant will evolve over time in line with the emerging demands on energy, the transition to low carbon, security of supply and affordability. In line with the policies in the London Plan, boroughs are encouraged to develop strategies for delivering district heating networks within the CAZ. Given the density of energy use in the CAZ, and especially the demand for heating (see Figure 5.9), the CAZ is particularly well placed to support district heating. However the density of land uses does provide challenges for delivering networks. The CAZ already has several models of delivering heat networks. These include:
- 5.7.9 Pimlico District Heating Undertaking (PDHU) a historic network (since 1950) managed by City West Homes. It provides heat and hot water to 3,256 homes, 50 commercial premises and three schools. The network is supplied by two combined heat and power (CHP) engines and three gas fired boilers.
- 5.7.10 Citigen operational since 1993 with a 25 year 'co-operation agreement' between the City of London and Citigen as the energy service company (ESCo) with EoN as the parent company. Run as a public private partnership, with Citigen responsible for the design, development, financing and operation of the scheme and carries the commercial risks. The City of London buildings provide the anchor heat loads and Citigen has separate supply agreements for heating and cooling supplies to individual sites and pipework licence agreements.
- 5.7.11 **King's Cross -** provides an example of the delivery of a new district heating system as part of a major regeneration project. The masterplan for the site allocated a building to house an energy centre, including thermal storage which will meet 99 per cent of the development's heating demand. The CHP engines will meet 79 per cent of the total power demand. As well as providing electricity, hot water and heating, the CHP plant will provide cooling to the office buildings through trigeneration. An ESCo manages the network, energy supply and billing service. The construction of the energy centre and heating network was carried out by a specialist company which will also operate and manage the centre for a

- minimum of 10 years, with a possible extension to the contract. It is envisaged that residents will save approximately five percent on their fuel bills.
- 5.7.12 **Bunhill** Energy Centre and district wide heat network is a scheme led by Islington Council to provide cheaper, greener heat to homes on several estates and buildings in the Bunhill area. Initially (from 2012) fed by a CHP engine to heat over 700 homes and the local baths and leisure centres, the network is to be connected to a further 454 homes in the area, with the potential to supply a further 1,000 homes and to capture waste heat from the tube network and an electricity substation. This project received European and national grants to facilitate its delivery. The Council's ownership and management of the scheme will help to maximise benefits for the local community and energy bill savings for residents.
- 5.7.13 **SELCHP** is an Energy from Waste Recovery Facility. Whilst not in the CAZ, this network has the potential to extend into the CAZ. From a 5km pipe work system, completed in 2014, the facility provides heat and hot water to 2,500 properties. This will help to reduce fuel poverty by making heat cheaper than gas and to provide low carbon heat, as the waste that SELCHP process is about 60 per cent renewable carbon.

Figure 5.9 Heating and Fuel Use



- 5.7.14 Other existing or emerging networks or site wide systems in the CAZ include:
  - VNEB (developer led area wide regeneration)
  - Whitehall (Government led historic network)
  - University College London (university led historic network)
  - Bloomsbury Heat and Power Consortium
  - Euston Road Energy Centre and District Energy Network (small emerging local authority led network to primarily heat existing housing with a direct link to a new commercial scheme).

#### Reducing and balancing energy demand

- 5.7.15 The London Plan (policies 5.1 5.8) and the Sustainable Design and Construction SPG set out the Mayor's requirements regarding minimising carbon dioxide emissions from development. Demand side management can play an important role in minimising carbon dioxide emissions and limiting the additional reinforcement that would otherwise be required of the electricity infrastructure in the CAZ. In order to minimise carbon and not impact air quality this aspect is about controlling demand as opposed to increasing local supply through the use of generators. The large developments in the CAZ play a potentially significant role being large electricity consumers. The central control of energy use across a building facilitates demand side management. For example, large offices and hotels could reduce the cooling or heating requirements to cater for increased demand elsewhere across the grid.
- 5.7.16 Developers are strongly encouraged to design their site and building wide energy systems so they can be monitored and are cable of being lowered to address a peak in demand in the wider network.

#### **Thames Tideway Tunnel**

5.7.17 This nationally significant infrastructure project gained its Development Consent Order in 2014. Construction is due to take place between 2015- 2023 with a major site at Kirtling Street, Battersea and other major sites at Albert, Victoria and Blackfriars Embankments (see Figure 5.10). The project will significantly reduce sewage discharge to the Thames. Its wider legacy is expected to create new riverfront spaces and opportunities for new and improved river transport potentially for passenger, freight and tourism/recreational uses. These opportunities should be explored where appropriate.

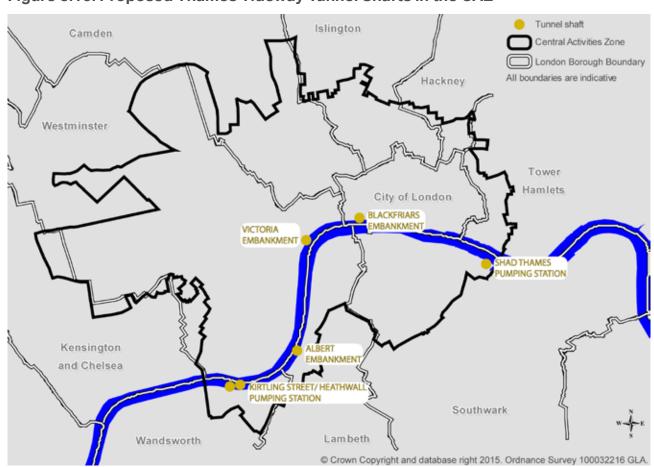


Figure 5.10: Proposed Thames Tideway Tunnel Shafts in the CAZ



# **SECTION 6:**

# **CAZ GEOGRAPHY**

#### 6.1 Introduction

6.1.1 This part of the SPG sets out guidance on the London Plan CAZ Diagram, the definition of the CAZ boundary in Local Plans and relationships with the Opportunity Areas, CAZ fringe, inner and outer London and the wider metropolitan area.

# 6.2 The CAZ diagram

- 6.2.1 The CAZ has a distinct economic geography, containing a range of concentrations, features and quarters. Some of these are depicted in the London Plan CAZ Diagram for example Opportunity/ Intensification Areas, the Royal Parks, the River Thames, clusters of state functions, arts, cultural and entertainment uses, health, legal and academic quarters and international retailing activity in the West End and Knightsbridge.
- 6.2.2 To support implementation of London Plan CAZ policies, Figure 6.1 provides further guidance on the interpretation of the CAZ Diagram including key policy cross-references.
- 6.2.3 It is recognised that the functional area of CAZ is changing over time and the need to facilitate growth may lead to modifications to the London Plan CAZ boundary in the future. Alterations to the indicative boundary of the London Plan CAZ Diagram will be considered through reviews and alterations to the Plan. More local refinements to the CAZ boundary can be managed through Local Plan reviews (see section 6.3 below).

#### Other CAZ clusters

6.2.4 There are other economic clusters within the CAZ that are not shown on the CAZ Diagram. One of the most significant of these is the financial and business services district in the City of London. Further analysis of employment clustering in the CAZ, northern Isle of Dogs and their fringes has been undertaken by GLA Economics<sup>149</sup>. Clusters of evening and night time economic activities are highlighted in Annex 2 of the London Plan (see also Section 2 of this SPG). Given the dynamic nature of the CAZ some clusters are evolving whilst others are changing or becoming more dispersed. In some cases it will be important to ensure that policy strikes an appropriate balance to sustain and nurture these clusters such as the arts, cultural, film and creative clusters in Soho/West End, whilst facilitating the growth of evolving ones – such as the digital/tech clusters at Tech City, Clerkenwell, Angel, Kings Cross and London Bridge/Southbank; and the life sciences research clusters around the Euston Road including the University College Hospital, the Wellcome Trust and the Francis Crick Institute (and on the CAZ fringe at Whitechapel and White City).

<sup>&</sup>lt;sup>149</sup> GLA Economics. Work and life in the Central Activities Zone, northern Isle of Dogs and their fringes. GLA, 2015

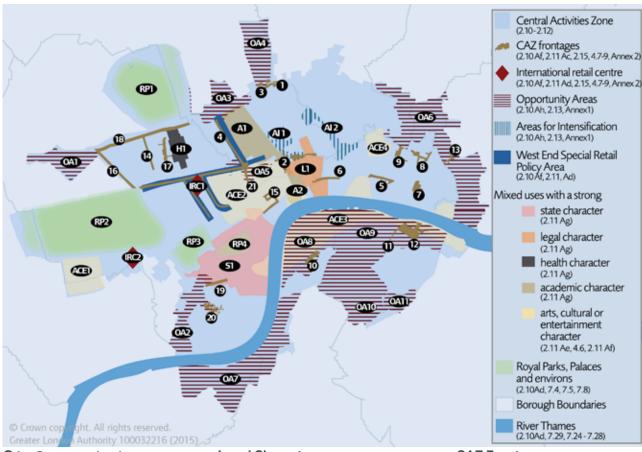


Figure 6.1: Annotated CAZ Diagram

#### **OA - Opportunity Areas**

OA1 - Paddington

OA2 - Victoria

OA3 - Euston

OA4 - Kings Cross/ St Pancras

OA5 - Tottenham Court Road

OA6 - City Fringe/ Tech City (part)

OA7 - Vauxhall, Nine Elms, Battersea University of London (part) A2 - University of Lor

OA8 - Waterloo

OA9 - London Bridge, Borough & Bankside

OA10 - Elephant & Castle
OA11 - Old Kent Road (part)

#### AI - Intensification Areas

Al1 - Holborn

Al2 - Farringdon/Smithfield

#### **IRC - International Retail Centres**

IRC1 - West End

IRC2 - Knightsbridge

#### **State Character**

S1 - Including Buckingham Palace, St. James's Palace, Palace of Westminster, Whitehall, other Government and State offices and The Mall

#### **Legal Character**

L1 - Temple, Royal Courts of Justice, Inn of Court

#### **Health Character**

H1 - Harley Street

#### **Academic Character**

A1 - University College London/ University of London

A2 - University of London School of Economics and Political Science/ University of London King's College London

# Arts, Culture or Entertainment Character

ACE1 - Royal Albert Hall/ Exhibition Road Museums

ACE2 - West End/ Soho/ Covent Garden

ACE3 - Southbank

ACE4 - Barbican

#### **Royal Parks, Palaces and Environs**

RP1 - Regent's Park

RP2 - Hyde Park/ Kensington Palace and Gardens

RP3 - Green Park/ Buckingham Palace Gardens

RP4 - St. James's Park

#### **CAZ Frontages**

- 1 Euston Road (part)
- 2 High Holborn/ Kingsway
- 3 Kings Cross/ St. Pancras
- 4 Tottenham Court Road (part)
- 5 Cheapside
- 6 Fleet Street
- 7 Leadenhall Market
- 8 Liverpoool Street
- 9 Moorgate
- 10 Lower Marsh/ The Cut
- 11 Borough High Street
- 12 London Bridge
- 13 Wentworth street
- 14 Baker Street
- 15 Covent Garden/ Strand
- 16 Edgware Road
- 17 Marylebone High Street
- 18 Marylebone Road
- 19 Victoria Street
- 20 Warwick way/ Tachbrook Street
- 21 Charing Cross Road (part)

# **Special Policy Areas**

6.2.5 In specific and exceptional circumstances it may be appropriate for boroughs to designate Special Policy Areas where development pressures and market conditions could lead to the loss of valued specialist clusters of uses or functions identified as having particular significance to London's unique identity, economic function or cultural heritage. Examples of SPAs include St James's (art/antiques), Savile Row (bespoke tailoring) and Hatton Garden (jewellery). Given the operation of the Use Classes Order and permitted development rights, SPAs often require the collaboration of landowners to achieve their objectives. SPAs should only be defined in the above exceptional circumstances to avoid stifling innovation and change that is a defining feature of the CAZ.

# 6.3 CAZ boundary definition in local plans

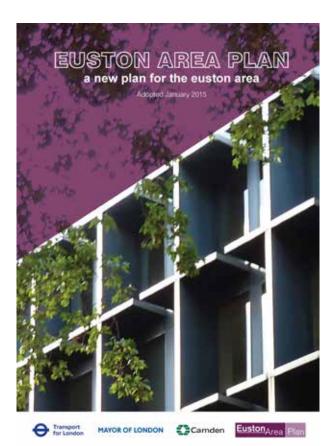
- 6.3.1 London Plan policy 2.10B requires boroughs to define the detailed boundary of the Central Activities Zone in Local Plans. As a general principle the detailed boundary of the CAZ in Local Plans should be defined having regard to the indicative CAZ Diagram in the London Plan. In exceptional circumstances there may be scope for boroughs, in collaboration with the GLA, to consider refinements to the detailed CAZ boundary in Local Plans taking into account the following guidelines:
  - a) incorporating areas with existing or potential significant agglomerations of one or more distinct central London functions which contribute to the unique character, scale, mix of uses and reputation of the CAZ (having regard to London Plan Policies 2.10-2.12 and the indicative schedule of CAZ uses/ activities in Table 1 of this SPG)
  - b) incorporating the relevant parts of the CAZ Opportunity Areas and in particular those parts of the Opportunity Areas which can be expected to contribute to the growth and agglomeration of central London functions and the unique character, scale, mix of uses and reputation of the CAZ
  - c) recognising that as a general principle the CAZ boundary should be drawn tightly to reflect areas of existing/potential central London functions.

#### 6.4 Central London definition (Mayor of London Order 2008)

6.4.1 The Mayor must be consulted on all planning applications that are of potential strategic importance to London. Definitions of potentially strategic applications are determined by the government and are set out in the Mayor of London Order 2008 including a definition of 'Central London'. The Mayor is working with Government seeking to devolve responsibility for defining the extent of 'Central London' in respect of applications of potential strategic importance (as defined in the Order) to the Mayor of London.

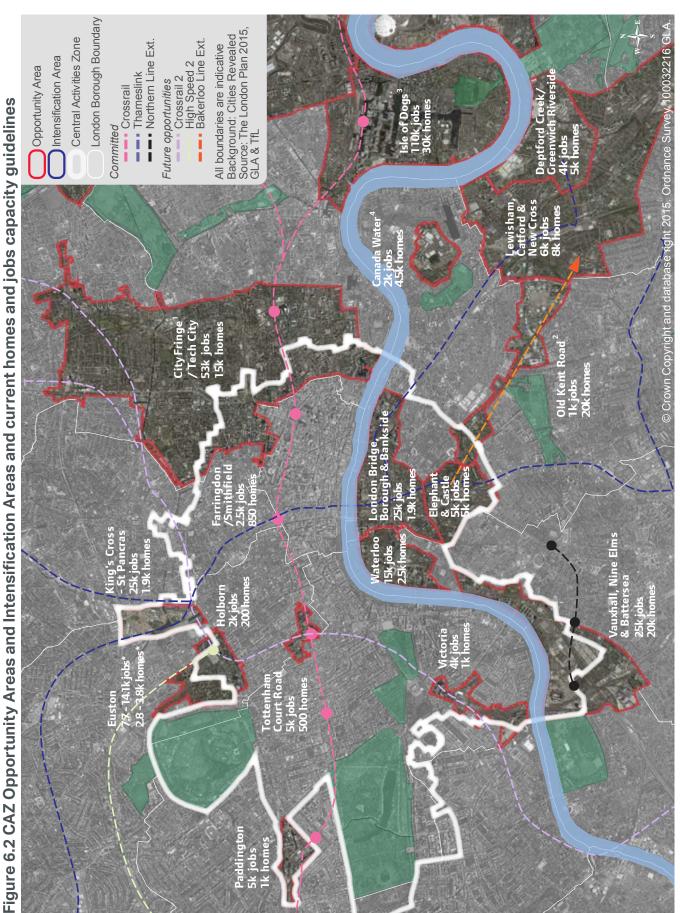
# 6.5 CAZ Opportunity and Intensification Areas

- 6.5.1 There are 11 Opportunity Areas (OA) and two Intensification Areas (AI) either wholly or in part within the CAZ. The indicative estimates of employment capacity and minimum guidelines for new homes shown in Figure 6.2 are those in the adopted London Plan (2015) with the exception of the City Fringe/Tech City (adopted Opportunity Area Planning Framework OAPF), Canada Water (Area Action Plan), Isle of Dogs and Old Kent Road (emerging estimates from work on draft OAPFs).
- 6.5.2 The Mayor has worked with all of the CAZ boroughs to produce OAPFs over the past 8 years (see Figure 6.3)<sup>150</sup>. In some instances the GLA has initiated and led the production of the OAPFs such as at VNEB (published 2012), Waterloo (published 2008 and subsequently the Waterloo SPG 2013) and City Fringe (December 2015). In other instances the GLA has worked jointly with the borough to deliver an OAPF such as at Euston (published 2015). In the case of London Bridge Bankside, Elephant and Castle, King's Cross, Paddington and Victoria, the Mayor has worked jointly with boroughs who have led the production of SPGs and Area Action Plans and has subsequently endorsed those plans as OAPFs. This has provided full OAPF coverage of the CAZ OAs with the exception of Tottenham Court Road.
- 6.5.3 OAPFs are supplementary planning guidance to the London Plan and as such have a considerable material weight for the purpose of planning decisions. The OAPFs produced by the GLA have included guidance on land use and development capacity and the urban structure of the OAs including tall building location, height and composition, layout and quantity of open spaces. The GLA have purchased the licenses of a number of 3d digitised models for the OAs within the CAZ and have most of the area covered. These models have been used to assess the impact of development on the city and to visualise the future form of the CAZ and assess impacts on heritage assets.



Euston Area Plan, adopted January 2015

<sup>&</sup>lt;sup>150</sup> See also the Mayors "Opportunity London" document (published 2015)



Note 1: City Fringe/Tech City capacity estimates updated through the adopted Opportunity Area Planning Framework (2015) Note 2: Jobs and homes estimates under review through the Old Kent Road Opportunity Area Planning Framework Note 3: Jobs and homes estimates under review through the Isle of Dogs Opportunity Area Planning Framework Note 4: Jobs and homes estimates updated through Canada Water Area Action Plan

6.5.4 The OAPFs have been supported by transport studies undertaken by TfL and in the case of VNEB and Elephant and Castle, a Development Infrastructure Funding Study (DIF) was also produced. The DIFs assess the value of development and the cost of all infrastructure, including transport and social infrastructure. These are then prioritised and a tariff or Community Infrastructure Levy (CIL) rate is applied which is used to part fund the infrastructure costs without undermining viability. This includes looking to establish fixed rates of affordable housing delivery as set out in the Mayor's Housing SPG.



Victoria Opportunity Area - example of local planning framework endorsed as OAPF



Vauxhall, Nine Elms, Battersea (VNEB) OAPF adopted 2012

- 6.5.5 Within the CAZ OAs a series of Management Boards have been established which are usually attended by the Deputy Mayor and the leaders of the respective councils. These have proved an effective way of establishing good governance for the delivery of the OA plans.
- 6.5.6 The GLA will be undertaking a review of the VNEB DIFs in late 2015, and will be working with Camden to look at the development potential at Euston in more detail as the HS2 programme progresses.

# 6.6 Relationship with CAZ fringe

- 6.6.1 The interface between the CAZ and its fringe<sup>151</sup> is an important one. There are more than half a million residents<sup>152</sup> and over 300,000 workforce jobs<sup>153</sup> within 1km of the CAZ. The areas adjoining the Zone present new opportunities for growth, development and regeneration. Their full potential should be secured to enhance and complement the functions and activities of the CAZ whilst meeting more local needs.
- 6.6.2 The Mayor has shared concerns about the impact of office to residential permitted development rights (PDR) on occupied office space outside the currently exempted areas<sup>154</sup>, including the effect it has on businesses and employment.
- 6.6.3 The impact of these changes is being monitored by the GLA in collaboration with the boroughs. Within the CAZ fringe there is evidence that Camden town, Islington, Oval/Kennington, Clapham and Wandsworth riverside have been particularly affected<sup>155</sup>. Some of the CAZ boroughs<sup>156</sup> have brought forward Article 4 Directions for selected locations outside the Zone which remove the permitted development rights for change of use from office to residential.
- 6.6.4 Within the CAZ fringe (to be defined locally) employment land reviews and local plan policies should ensure the availability of office and related workspace, including small units for start-ups, small and medium sized enterprises and, where there is local evidence of need and viability, 'affordable' workspace. This should also include an adequate supply of industrial type space to service the needs of the CAZ and local businesses and communities (see Section 1.8).

<sup>&</sup>lt;sup>151</sup> There is no universally accepted definition of the CAZ 'fringe' – it can range from areas adjoining the CAZ to wider areas of inner London.

<sup>&</sup>lt;sup>152</sup> Source: GLA (based on 2011 Census)

<sup>&</sup>lt;sup>153</sup> GLA Economics. Work and life in the Central Activities Zone, northern Isle of Dogs and their fringes. GLA, 2015

<sup>&</sup>lt;sup>154</sup> The Central Activities Zone, Tech City, north of the Isle of Dogs, the Royal Borough of Kensington & Chelsea and the Royal Docks Enterprise Zone are currently exempt from offices to residential permitted development rights (see Section 1.2)

<sup>&</sup>lt;sup>155</sup> See Ramidus Consulting. GLA (July 2015) op cit, Figure 3.9.

<sup>&</sup>lt;sup>156</sup> See for example Article 4 Directions brought forward by the London Borough of Islington, Camden and Hackney

Figure 6.3 CAZ specific and the Isle of Dogs Opportunity Areas – planning frameworks/ Local Plans (status as at February 2016)

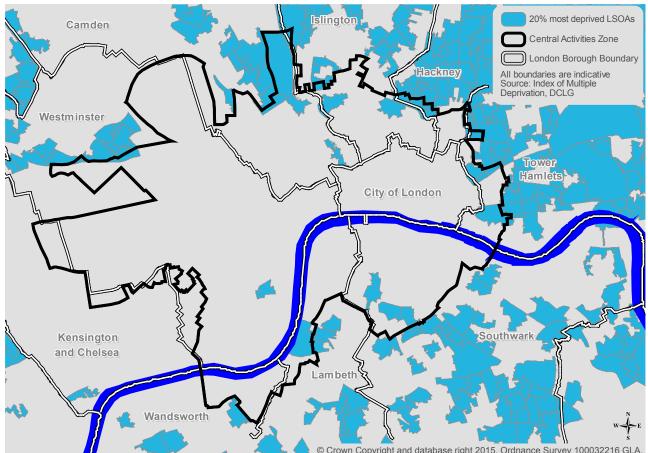
Local	Pialis (Status as at	1 Colitary 2010)
Ref#	Opportunity Area	Planning frameworks/Local Plans
5	City Fringe/ Tech City	OAPF (Adopted December 2015) Hackney Core Strategy (November 2010) Islington Development Management Polices (June 2013) Islington Core Strategy (February 2011) Finsbury Local Plan (June 2013) Tower Hamlets Core Strategy (September 2010) Tower Hamlets Managing Development Document (April 2013)
11	Elephant & Castle	Elephant and Castle SPD* /OAPF (March 2015) Southwark Core Strategy (April 2011)
12	Euston	Euston Area Plan (January 2015) Camden Core Strategy (2010) Camden Development Policies (2010) Camden Site Allocations (September 2013)
17	Isle of Dogs	OAPF in preparation (Consultation expected 2016)
19	King's Cross - St Pancras	Camden Core Strategy (2010) Camden Development Policies (2010) Camden Site Allocations (September 2013) Islington Development Management Polices (June 2013) Islington Core Strategy (February 2011) King's Cross Opportunity Area Planning and Development Brief (January 2004)*
21	London Bridge, Borough and Bankside	Southwark Core Strategy (April 2011) Blackfriars Road Supplementary Planning Document (January 2014) Draft Bankside, Borough and London Bridge SPD (February 2010)*
24	Old Kent Road	OAPF in preparation (Consultation expected 2016)
25	Paddington	Westminster City Plan: Strategic Policies (November 2013) Westminster Unitary Development Plan (January 2007)
31	Tottenham Court Road	Westminster City Plan: Strategic Policies (November 2013) Westminster Unitary Development Plan (January 2007)
33	Vauxhall Nine Elms Battersea	Vauxhall Supplementary Planning Document (January 2013) OAPF (March 2012) Lambeth Core Strategy (adopted January 2011) Lambeth Unitary Development Plan (August 2007) Wandsworth Core Strategy (October 2010) Wandsworth Development Management Policies Document (October 2012) Site Specific Allocations Document (February 2012)
34	Victoria	Westminster City Plan: Strategic Policies (November 2013) Victoria Area Planning Brief (July 2011)* Westminster Unitary Development Plan (January 2007)
35	Waterloo	Waterloo Supplementary Planning Document (April 2013) Lambeth Core Strategy (adopted January 2011) OAPF (October 2007) Lambeth Unitary Development Plan (August 2007)
# Roford	ences from London Plan	Annov 1

<sup>#</sup> References from London Plan Annex 1

<sup>\*</sup> endorsed by GLA as OAPFs

6.6.5 The fringe of the CAZ contains a significant number of areas in need of regeneration (London Plan Policy 2.14) which are among the 20 per cent most deprived in London. Figure 6.4 illustrates that many of these areas lie immediately to the north and east of the CAZ with other notable clusters to the south and northwest. These areas require integrated action across a range of matters including learning and skills, employment, housing (including affordable housing), transport, environment, inclusive access, community safety and health.

Figure 6.4 London Plan Regeneration Areas and CAZ / fringe



- 6.6.6 Several of the CAZ Opportunity Areas will play an important role in the interface between the CAZ and its immediate hinterland, including City Fringe/ Tech City, King's Cross and Euston, Paddington and Victoria, VNEB, Waterloo, London Bridge and Bankside, Elephant and Castle and the Old Kent Road. Local Plans, frameworks and proposals for these areas should support the integration and wider regeneration of surrounding areas including access to employment, housing, new infrastructure, facilities and services and environmental improvements.
- 6.6.7 The City Fringe/Tech City Opportunity Area will play a key role in facilitating growth in commercial and economic functions to the northeast of CAZ, particularly in areas such as Whitechapel, Bishopsgate, Shoreditch and corridors extending through Hackney to Dalston and Hackney Central<sup>157</sup>.

<sup>&</sup>lt;sup>157</sup> For further details see Mayor of London. City Fringe/Tech City Opportunity Area Planning Framework. GLA, 2015

6.6.8 Parts of the CAZ fringe are facilitating growth and expansion of CAZ type activities including commercial development. Where appropriate these areas can be considered through local refinements to CAZ boundary definitions in Local Plan proposals maps (see Section 6.3) and in the future through reviews of the London Plan CAZ Diagram.



City Fringe Opportunity Area

- 6.7 Relationship with the rest of London and wider metropolitan area
- 6.7.1 The CAZ has close functional relationships with other parts of London and the wider metropolitan area.

#### Relationship with North of Isle of Dogs

6.7.2 Though separate from the CAZ, the north of the Isle of Dogs (see indicative area illustrated in the SPG Introduction) has very close functional relationships with the Zone in terms of its world city financial and business services functions. As such it is treated in the same way as the City of London in terms of London plan office policy (4.2) and mixed use development policy (4.3Aa) (see Section 1 of the SPG).

#### Relationships with other parts of Inner and Outer London

- 6.7.3 Other parts of inner and outer London also have important functional relationships with the Central Activities Zone including, but not limited to:
  - Labour supply and access to employment inner and outer London (along with parts of the wider metropolitan area) support the labour supply requirements of CAZ. Figure 6.5 illustrates commuting by workers to CAZ based workplaces by residence origin in Greater London
  - Economic linkages including employment, business clusters and networks and supply chains
  - Transport strong connectivity to inner and outer London through the network of tube, rail, DLR, waterways and roads
  - Connected urban areas linkages with Opportunity Areas and town centres in inner and outer London
  - Retail/cultural/leisure/entertainment offer of CAZ needs to be accessible to all Londoners
  - Housing supply the world city and strategic functions of the CAZ depend on housing and affordable housing delivery in the rest of London to ensure that businesses, functions, services and activities have access to a supply of labour as well as to take pressure off the CAZ to accommodate the acute need for housing in the capital

- Green and open space networks including the Blue Ribbon Network
- Servicing the CAZ including logistics, industry, waste management, land for transport and wholesale markets.

#### Relationships with the wider south east metropolitan area

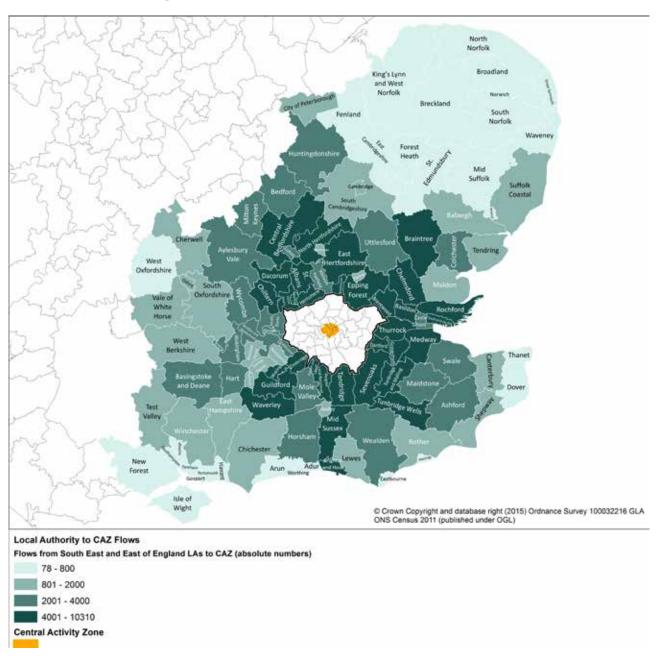
6.7.4 The CAZ also has strong interrelationships with the wider metropolitan area outside London. Connectivity and transport infrastructure improvements (including airports, rail, tube, road and potential new public transport infrastructure such as Crossrail 2) along with access to a regional labour market are all essential to sustain the unique scale and economic functions in the CAZ. The wider south east forms an important part of the travel to work area for the Zone and Figure 6.6 illustrates commuting by workers to CAZ based workplaces by residence origin in the Greater South East (excluding London). Other relevant functional linkages between the CAZ and wider south east include logistics, business networks and the Blue Ribbon Network.

© Crown Copyright and database right (2015) Ordnance Survey 100032216 GLA ONS Census 2011 (published under OGL) Flows from MSOAs in London to and within the CAZ Central Activity Zone 130 - 500 501 - 1000 1001 - 1500 1501 - 4700

Figure 6.5: Workers in CAZ based workplaces by residence origin in London, 2011, absolute numbers

Source: GLA Economics

Figure 6.6: Workers in CAZ based workplaces by residence origin in the Greater South East (excluding London), 2011, absolute numbers



Source: GLA Economics

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Nếu bạn muốn có văn bản tài liệu này bằng ngôn ngữ của mình, hãy liên hệ theo số điện thoại hoặc địa chỉ đưới đây.

#### Greek

Αν θέλετε να αποκτήσετε αντίγραφο του παρόντος εγγράφου στη δική σας γλώσσα, παρακαλείστε να επικοινωνήσετε τηλεφωνικά στον αριθμό αυτό ή ταχυδρομικά στην παρακάτω διεύθυνση.

#### Turkish

Bu belgenin kendi dilinizde hazırlanmış bir nüshasını edinmek için, lütfen aşağıdaki telefon numarasını arayınız yeya adrese başvurunuz.

# Punjabi

ਜੇ ਤੁਹਾਨੂੰ ਇਸ ਦਸਤਾਵੇਜ਼ ਦੀ ਕਾਪੀ ਤੁਹਾਡੀ ਆਪਣੀ ਭਾਸ਼ਾ ਵਿਚ ਚਾਹੀਦੀ ਹੈ, ਤਾਂ ਹੇਠ ਲਿਖੇ ਨੰਬਰ 'ਤੇ ਛੋਨ ਕਰੋ ਜਾਂ ਹੇਠ ਲਿਖੇ ਪਤੇ 'ਤੇ ਰਾਬਤਾ ਕਰੋ:

#### Hindi

यदि आप इस दस्तावेज की प्रति अपनी भाषा में चाहते हैं, तो कृपया निम्नलिखित नंबर पर फोन करें अथवा नीचे दिये गये पते पर संपर्क करें

# Bengali

আপনি যদি আপনার ভাষায় এই দলিলের প্রতিলিপি (কপি) চান, তা হলে নীচের ফোন্ নম্বরে বা ঠিকানায় অনুগ্রহ করে যোগাযোগ করন।

### Urdu

اگر آپ اِس دستاویز کی نقل اپنی زبان میں چاھتے ھیں، تو براہ کرم نیچے دئے گئے نمبر پر فون کریں یا دیئے گئے پتے پر رابطہ کریں

#### Arabic

إذا أردت نسخة من هذه الوثيقة بلغتك، يرجى الاتصال برقم الهاتف أو مراسلة العنوان أدناه

# Gujarati

જો તમને આ દસ્તાવેજની નકલ તમારી ભાષામાં જોઇતી હોય તો , કૃપા કરી આપેલ નંબર ઉપર ફોન કરો અથવા નીચેના સરનામે સંપર્ક સાદ્યો.