

## **Better Bankside: The London Plan (draft) Consultation**

### ***Introduction***

Better Bankside Business Improvement District (BID) are pleased to submit a response to The London Plan (draft) consultation.

Better Bankside welcome The London Plan and the initiatives outlined in the plan. The London Plan sets out planning objectives for London's future and Better Bankside are supportive of the proposed objectives and initiatives.

There are, however, a number of factors that should be taken into consideration to ensure The London Plan is robust and can achieve its ambitious objectives.

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

London Bridge and Bankside are listed as Opportunity Areas within The London Plan. Better Bankside welcome this designation and feel it is appropriate given that the area is continuously evolving, while maintaining its unique historical character.

While Better Bankside welcome this designation, it is not clear within the plan how the Opportunity Area designation will impact local businesses, residents and the wider community. It is also not clear how the Opportunity Area designation will impact the heritage of the Bankside area, especially around Borough Market and Borough High Street.

Better Bankside would welcome additional information on how the Opportunity Area Planning Framework (OAPF) will ensure joined-up and robust planning processes. The OAPF does not enforce that local Councils take into consideration the overall impacts of development, including development impacts on the road network, pressures on local transport, etc. Often planning processes and development in Opportunity Areas area disjointed and completed in silo from one another.

Better Bankside would welcome additional information on how the identified Opportunity Areas located around London Bridge and Bankside will impact the area. For instance, will development at the Elephant and Castle Opportunity Area put pressure on the already highly congested Bankside road network?

Furthermore, Better Bankside would like information on how the core elements of The London Plan will be realised through the Opportunity Area. For instance, how will the transport objectives be brought forward and funded in the London Bridge and Bankside Opportunity Area?

### ***Chapter 3: Design***

Policy D7 acknowledges the role of the public realm in delivering attractive, healthy and sustainable places and supporting good growth. Better Bankside are pleased that this is recognised at both the strategic and development proposal level.

In recent research of Better Bankside's membership as to what Better Bankside's priorities should be for the next 5 years, 86% wanted greater investment in public spaces and urban greenery, 79% wanted greater investment in air quality measures and 75% wanted to see streets improved to support walking and cycling.

The policy draft encourages the adoption of urban design principles to improve the public realm and this is advocated by Better Bankside, who has been working in partnership with many local and strategic agencies and landowners to deliver Bankside Urban Forest<sup>1</sup>, the placemaking strategy for Bankside over the last 10 years.

Improving the legibility and permeability of London's streets are cohesive with many of Better Bankside's project aims relating to the public realm. Connectivity improvements that are led by enhancements to the urban fabric will be key in creating walkable and cyclable streets which are also in conjunction with Point B pertaining to the discouragement of vehicle use.

Such aspirations are exemplified by one of Better Bankside's other strategic projects: The Low Line<sup>2</sup>. A partnership driven project, it connects London Bridge with Waterloo stations through a traffic-free route along the base of a viaduct that dissects the area. The Low Line also encourages economic viability south of the viaducts.

Unlocking alternative routes such as The Low Line, that are inviting for pedestrians and/or cyclists will help to alleviate congested thoroughfares currently under pressure; offering journeys with improved air quality that are also in-keeping with the local character and reflect its heritage. The promotion and actualisation of these considerations to the public realm must be incorporated into policy within Area-specific and Local Plans.

Point C within the draft policy indicates that an appreciation of the existing location and activities are critical to the success of creating a sense of place, and that development proposals ought to reflect this. Point E also states that any planned works should consider the function of buildings within the immediate area. Although supportive of this in both instances, Better Bankside would suggest an amendment to the policy that encouraged proposals affecting the public realm to involve the residents and business users within the vicinity to ensure the most appropriate design outcomes.

## **Chapter 6: Economy**

Better Bankside support variety in the retail sector, particularly given that Bankside's retail offering can be improved. However, there is concern that the lack of police officers on the street has led to businesses losing confidence in the level of support from police, which had led to crimes not being reported. This lack of confidence coupled with a reticence to work with officers - and refusal from businesses to take the necessary precautions in terms of security provision and staff training - means that retail crime largely goes unopposed.

The London Plan should ensure that it not only encourages diversity but should also make recommendations for the level of security personnel required for retailers and the level of staff training required in order to design out crime. Designing out crime advice/guidelines should not only be

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<sup>1</sup> [www.betterbankside.co.uk/bankside-urban-forest](http://www.betterbankside.co.uk/bankside-urban-forest)

<sup>2</sup> <http://www.betterbankside.co.uk/buf/the-low-line>

reserved for large developments, but also for smaller retail units to provide guidance on how store layouts can minimise retail theft for example.

Having seen the effects of the London Bridge/Borough Market attack first hand, we would advise that all markets in London should be target hardened to prevent against terrorist attacks. Heavy Vehicle Mitigation (HVM) should be required as standard, and local and central government should make financial support available to assist in the installation of this. Markets should be required to have experienced security teams on hand during operating hours. These teams need to be well trained and highly motivated. Having well trained and highly motivated staff will not only dissuade would-be terrorist attackers, but would also have an impact on the other types of crime that plague crowded markets, such as pickpocketing.

Markets also need to be held responsible for the impact they have on the local environment. Busy markets generate a large amount of waste and litter. They should ensure that they are keeping the areas they cover well maintained and serviced in terms of the street scape.

Better Bankside support better management of retails clusters. Thought needs to be given to the types of businesses in any high street and no one service should be favoured if possible. For example, having a proliferation of betting shops, pawn shops, payday loan lenders in one area will draw a particular type of user to that area. This will normally have a knock-on effect on the crime in the area with rates of shoplifting, robbery, burglary, and drug use increasing. Again, this is where variety in the offering in an area is important.

Areas will also need suitable support to manage public spaces and support the community. Street cleaning, refuse collection and crime prevention all need to be factored into this plan as all areas are interlinked. The Police, Local Authorities and business community all need to work together to ensure that their retail centres are clean, inviting and safe.

The London Plan does not take into account the impact that takeaways have on the environment and the cleanliness of an area. Borough High Street is saturated with hot food and late-night takeaways. Each day these takeaways account for 75% of the litter dropped on the street. Most of this litter is not recyclable and often thrown away. Takeaway businesses should be responsible for the packaging they use and how their customers dispose of their produce. Takeaway premises should be required to provide external litter bins within the area that they operate and contribute to the costs of cleaning up their mess.

Historically Bankside was London's entertainment quarter for activities which would not have been officially permitted within the City, and today it remains a hub of entertainment - home to some of the world's most renowned cultural institutions, Tate Modern, Shakespeare's Globe and Borough Market. On average, over 2.5 million people are recorded each month via Better Bankside's footfall cameras. The area has almost 2000 hotel rooms. In response to point 6.10.2 and meeting the accommodation demands of tourists, Better Bankside in turn need to ensure infrastructure in an area supports the overnight visitors. If a 24-hour city is to be achieved in London, there needs to be consideration of noise implications to residents, street cleaning teams, confidence in the streets late at night and appropriate policing, as well as an effective late-night transport system.

Furthermore, a successful and well managed night-time economy lies at the heart of the strategy to achieve this end result. Devising and delivering those management arrangements is what Better

Bankside and other BIDs around the city are engaged in. They bring resource, innovation and an appetite for collaboration with other stakeholders. One example of this is the employment of Section 92 Officers.

Better Bankside has deployed a 7 day a week warden service in partnership with Southwark Council for the past 14 years. An analysis of the timing and nature of crime statistics indicated that a significant part of the problem impacted outside the hours that the wardens are active (08:00 – 20:00). And it was on order to address these night time hours that was one of the motivations for our investment in Section 92 officers.

Each area is different. It is useful to have a pan-London framework for dealing and developing the night-time economy. But a central tenet of that framework should be that areas need to be able to develop solutions customised to local conditions. The application of Busk in London serves to illustrate how a regime that may work perfectly well in one location can be inappropriate elsewhere. Joined up thinking at the strategic pan-London level, allied to locally forged management initiatives at the tactical level is the way forward.

### ***Chapter 7: Heritage and Culture***

Better Bankside are widely supportive of the Mayor's policy proposal concerning heritage conservation and growth.

Indeed, Better Bankside welcomes a policy framework which ensures that development proposals consider the context in which they are situated and outlines the necessary considerations to conserve an area's existing architectural heritage but also reflect and enhance its historic character to develop a sense of place that remains sensitive to its environment.

As part of a wider programme of public realm improvements along Borough High Street, Better Bankside have embarked on an exemplar project named the Inns and Yards<sup>3</sup>. This project intends to provide a safer, healthier connection between the attractions along Borough High Street and London Bridge station. However, additionally driving the project's ambition is telling the story surrounding street's former uses. This will be achieved through a carefully considered choice of materials, graphics and layout decisions that echo the Inns and Yards' history, whilst enhancing the existing heritage features.

### ***Chapter 8: Green Infrastructure and Natural Environment***

Better Bankside echo the London Plan's policy assertion that the use of green infrastructure must play an integral role in meeting the City's sustainability aspirations and support Policy G1.

Better Bankside also welcome the various social and environmental benefits to integrating green infrastructure within the urban setting that have been acknowledged within the draft policy. Better Bankside would appeal to Local Plans to set minimum standards to development proposals to ensure that the potential benefits of green infrastructure are captured and maximised.

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<sup>3</sup> <http://www.betterbankside.co.uk/buf/historic-inns-and-yards-off-borough-high-street-set-to-benefit-from-investment>

Better Bankside have implemented a range of green infrastructure interventions including green roofs, green walls, tree planting, and other on street green interventions. Green infrastructure in Bankside helps support the attractiveness of the area, supporting growth and delivering environmental and economic services. Additionally, Better Bankside employs an Urban Gardener via an apprenticeship initiative and organises a Gardening Club with its business members that allow people to engage directly with the green infrastructure in the neighbourhood. This capitalises on the wellbeing benefits of interacting with nature and encourages stewardship over public spaces.

Policy G5 within the New London Plan sets out a robust proposal relating to the implementation of urban greening measures for new developments. While Better Bankside generally supports the inclusion of the Mayor's 'Urban Greening Factor' as a useful tool for developers and Local Authorities, we suggest that the approach could be refined through greater scenario testing to ensure that quality, and quantity of Urban Green infrastructure needed to support growth and a resilient city are achieved. Having planted over three hundred streets, and delivered over 5,000m<sup>2</sup> urban greening within the Bankside neighbourhood, Better Bankside have evidential experience into the effectiveness of green interventions within the urban setting.

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

Better Bankside are supportive of the Mayor's proposed sustainable infrastructure proposals and agree that steps must be taken to ensure that the public are exposed to poor air quality.

Better Bankside encourages the Mayor to work with Councils to ensure that air quality policies, assessment and programmes are undertaken through planning application processes. This will ensure that new developments or refurbished developments are taking into consideration impacts on local air quality.

Better Bankside also encourages the Mayor to work with Councils to ensure that new developments work together to minimise energy outputs and impacts on local air quality. For instance, adjacent developments should consider shared heating and air-cooling systems, minimising the need for each development to have its own system.

Additional information on how the air quality initiatives and programmes will be funded is needed. The programmes presented within The London Plan are ambitious and will require significant funding. Furthermore, to improve local air quality, the Mayor must ensure that new developments include adequate cycling facilities, including secure storage areas, showers, etc. Feedback from those who work in Better Bankside state that existing cycling facilities for new developments do not meet existing and growing demand.

### ***Chapter 10: Transport***

The transport objectives outlined in The London Plan, are ambitious and, if realised, will create an accessible, efficient and well-connected network. Better Bankside welcome and support the transport objectives set out in The London Plan. The focus on Healthy Streets will ensure that streets are well-balanced by prioritising sustainable transport modes over the private vehicle. The focus on Healthy Streets will further ensure that more people living and visiting in London walk, cycle and use public transport over other modes of transport.

Additional information is, however, needed to outline how the transport initiatives within The London Plan will be funded. This is especially relevant following the removal of Transport for London's (TfL) funding grant from the central government and as bus and Tube patronage decreases. The indicative list of transport scheme outlined the cost per scheme, with over half of all schemes noted as 'medium' to 'high' costs.

This section of the plan should outline how new transport offers, such as Uber, have impacted the current road space/the overall transport network, and how the proposed transport schemes will rebalance the road network in favour of sustainable transport.

Additional information is needed on how the proposed transport schemes will improve air quality across London and, in particular, central London. Further, the plan must outline how the proposed transport initiatives interact with other elements of the plan to improve air quality and note which initiatives can be brought forward to improve air quality.

The London Plan does not address the role new technology will have on the transport network, including both benefits and challenges.