Characterisation and Growth Strategy LPG

The Characterisation and Growth Strategy LPG provides an overview of the three-stage process of preparing a characterisation survey and growth strategy as well as setting out the three area types to address of conserve, enhance and transform.

We support the principle of setting out a consistent London-wide approach to area analysis and consider this to be a positive move. We further support the notion that planning policies should be based on a thorough understanding of an area and that characterisation analysis are an appropriate mechanism to achieve this. A good characterisation should define neighbourhoods and should be used to develop strategic objectives for each, providing a tool for engaging communities.

Concern is raised, however, regarding the level of resourcing, capacity and skills that will be needed to execute the characterisation study and growth strategy as well as to achieve meaningful engagement with the local community.

Preparation of the characterisation study and growth strategy will require substantial resourcing and a high level of expertise or previous experience with this type of work. This level of resourcing and time commitment is not readily available, even in well-staffed boroughs, as the work will have to be balanced with other priorities such as substantial caseloads and some, if not most, staff will require training or upskilling before the work can be undertaken. Extensive resourcing will be required not only to prepare and agree the study and strategy yet also to maintain, amend and monitor them in the longer term. We can, however, see the value in undertaking this work if it can be used to inform how the borough's housing targets are set as this would provide a greater benefit.

The strain on officers will be additionally compounded by the resourcing and capacity required to achieve the level of engagement needed for a meaningful consultation process with the local community. Community consultation, and capturing local knowledge, will be integral to delivering a robust characterisation study and appropriate growth strategy, however, we need to make the consultation process as accessible as possible. Substantial investment in neighbourhood capacity building is necessary for delivering the outputs set out across the three LPGs and we should not expect the local community to be well versed in visual analysis, spatial awareness or the specialist knowledge that is required to undertake a characterisation study. It is also envisaged that neighbourhood boards (including residents, local businesses and community organisations) will need to be established to enable the various design visioning and placemaking exercises which will require additional resources from officers and the community alike.

Whilst we understand the benefits of digital mapping and the benefits this can bring to public consultation, we are concerned that the shift to digital will inevitably involve a degree of digital exclusion, affecting those who cannot afford the required tools or do not possess the skills to participate. For clarity, we support the aim for web-based policies and maps as they provide opportunity and to be dynamic and can easily be updated, however, we know this will require significant up-skilling in not just the community, yet the local authority also. The 'Understanding Southwark' survey by Social Life has previously raised significant concerns by residents about

the extent of consultations moving online. Imperative to this work is therefore funding for capacity building in design, public realm and digital tools.

There are also multiple public consultation points within each LPG that, when considered together, will require a significant amount of the local community's time which not every not every interested participant may be able to commit. As a borough we have only recently finished several substantial consultations processes for the Southwark Plan, Heritage SPD and SCI and this would add more workshops, events and documentation to interrogate to those interested members of the community who have already spent the last few years engaging with the Council.

It is further unclear how the new suite of LPGs will relate to the recently adopted Southwark Plan, and to an extent, the Heritage SPD, and if the policies will need to be revised to reflect this new approach to spatial planning. Area wide design visions does align with the approach taken in the Southwark Plan and although further mapping is required, many of the elements of the characterisation study are already mapped for the borough online and we are mindful of repeating the same exercises. We can see an opportunity for consolidating the number of maps required (e.g. land use + land availability; blue infrastructure + flood risk), to reduce the resources needed.

We support the use of a typological approach to characterisation studies and would further state that any description needs to be objective. We also support the consistency that will be achieved by using London's Historic Character Thesaurus, however, we are concerned that this adds a further 199 pages of guidance for officers to familiarise themselves with and for local communities to comprehend.

Whilst the guidance suggests that the characterisation study can be undertaken on a borough-wide basis, we would consider a ward / neighbourhood level to be more successful as the analysis needs to be more granular for the local community to feel it is applicable to their immediate context and engage with. The diagram examples in the guidance are too broad brush and do not explain what they are showing, which could be misleading.

It would be more beneficial if the area characterisation suggested sub-areas or areas of consistency which could be better understood and more easily recognised by each community as this would result in a more meaningful engagement. Each sub-area should have broad principles to inform the vision of the area with this used to help gauge the affected community's view of their neighbourhood.

We would also suggest adding access to social and commercial infrastructure (education, health etc) to the character elements as this contributed to quality of place.

Concern is further raised with the recommendation in the guidance to assess by character types with 'Strengths, Weaknesses, Opportunities and Threats' (SWOT) as this is deemed too high level and too broad as a form of analysis. The character types should not be judged out of the context of their immediate surroundings and risks inconsistencies at the London wide level as different boroughs may provide a different SWOT analysis of the same character type. It is recommended that the GLA may be better placed to undertake this type of analysis if it is going to be applied to character types to ensure consistency.

The guidance on undertaking the Character evaluation is incredibly qualitative and vague, and it is further unclear as to how the four suggested terms set out in the quality and sensitivity

analysis (Design quality, sensitivity to change, social significance and opportunity for growth) relate to each other. The example provided does not offer any clarity as we cannot see how an area recognised as having high design quality, high sensitivity to change and high social significance can also be identified as an area with a high opportunity for growth. Further guidance on this analysis would be recommended as well as to the different weights which would be attributed to each term.

We would also suggest providing additional guidance on assessing an area's capacity for growth as this is not well explained and seems like a value judgement which is difficult to evidence. Currently, the only added consideration, it seems, (beyond area characterisation and growth assessment) is the availability of existing or planned transport links.

We expect this process to consolidate and reinforce the areas of conservation, change and growth as identified in the recently adopted Southwark Plan. We are understanding the suggested 'conserve' areas as existing conservation areas and would welcome further guidance on how to propose new conservation areas under this process. The guidance should also be clear that tall buildings are not suitable in conserve areas. We further do not think that enhance areas suitable for tall buildings either and would suggest that the guidance be clear this area is principally about in-fill design. The guidance is exceptionally light on transform areas and clearer, more detailed advice is needed, especially regarding tall buildings. We would suggest the default stance should be that regard be given to the existing and prevailing building heights and lines. We are also concerned about the association of the term 'transform' and the impact this may have on residents who will have their own opinion, likely positive, on their neighbourhood as well as the connotation that this area will be undergoing significant change and extensive construction works.

Lastly, we do not consider the suggestion, within the tall building guidance, of a borough-wide 6 storey, 18m threshold is suitable for large areas of Southwark. The recently adopted Southwark Plan has already identified the areas within the borough which are appropriate for tall buildings and sets out the criteria the buildings need to comply with. This LPG should highlight the potential for 3D tools (such as VU City) for assessing visual impact of tall buildings as well as making visual a criterion of the assessment of sensitivity. Any assessment should include a range of height (low, medium, high) and should avoid causing harm to heritage assets and their settings. Local authorities should be encouraged to prepare additional guidance associated with tall buildings as once consented, it is difficult to resist additional towers. Further guidance would also be welcomes on visual separation of tall buildings and creating a recognisable silhouette with merging of towers discouraged.