

NEW SOUTHWARK PLAN BACKGROUND PAPER

TALL BUILDINGS
JUNE 2020

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1 Executive Summary

1.1 Purpose of background paper

This background paper provides the policy context and evidence supporting the New Southwark Plan (NSPL1) Policy 16: Tall buildings, and should be considered alongside Southwark's Area Action Plans and Supplementary Planning Documents. (NSPL3 to NSPL8). It is intended that this paper inform the development of the Local Plan and demonstrate how evidence has been applied in order to formulate policies relating to the appropriate location and design of tall buildings.

This background paper further highlights the relevant policy and guidance which has informed policy P16 including The London Plan (NSPR1) and the draft New London Plan (NSPR2) which sets out the strategic requirements at a regional level to assess and manage London's future growth through the implementation of tall buildings. The Historic England Advice Note 4: Tall Buildings (NSPN3) is also considered as this guidance gives special attention to a development's impact on heritage assets.

Once the New Southwark Plan is formally adopted by the council, planning decisions must be made in accordance with the policies set out in the development plan unless other material considerations indicate otherwise. The New Southwark Plan will replace the Core Strategy (2011) and saved Southwark Plan (2013) policies.

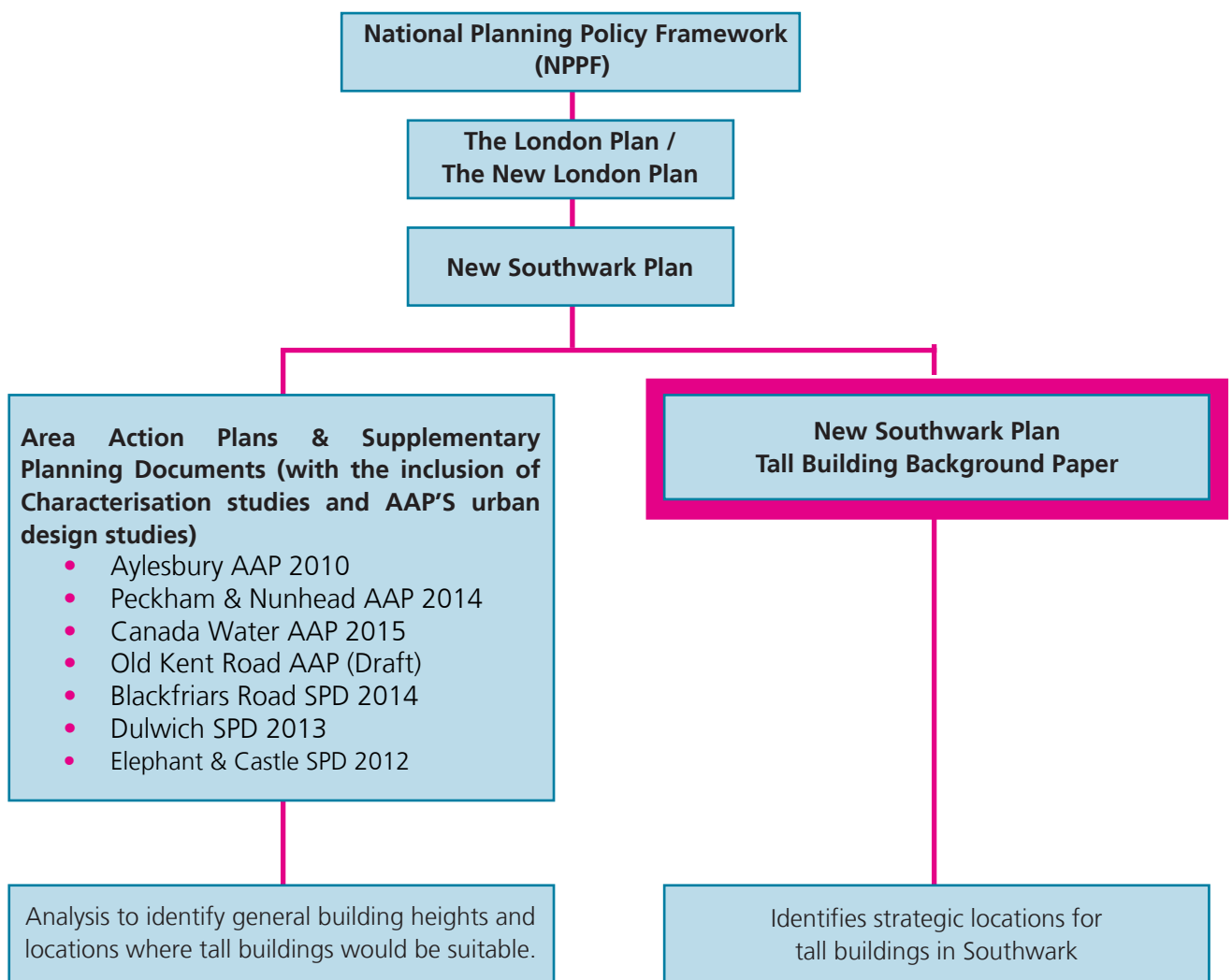


Figure 1: Planning policy context and Southwark's relevant tall building strategy documents

1.2 Scope of background paper

This paper covers the entirety of the London Borough of Southwark, as seen in figure 2.

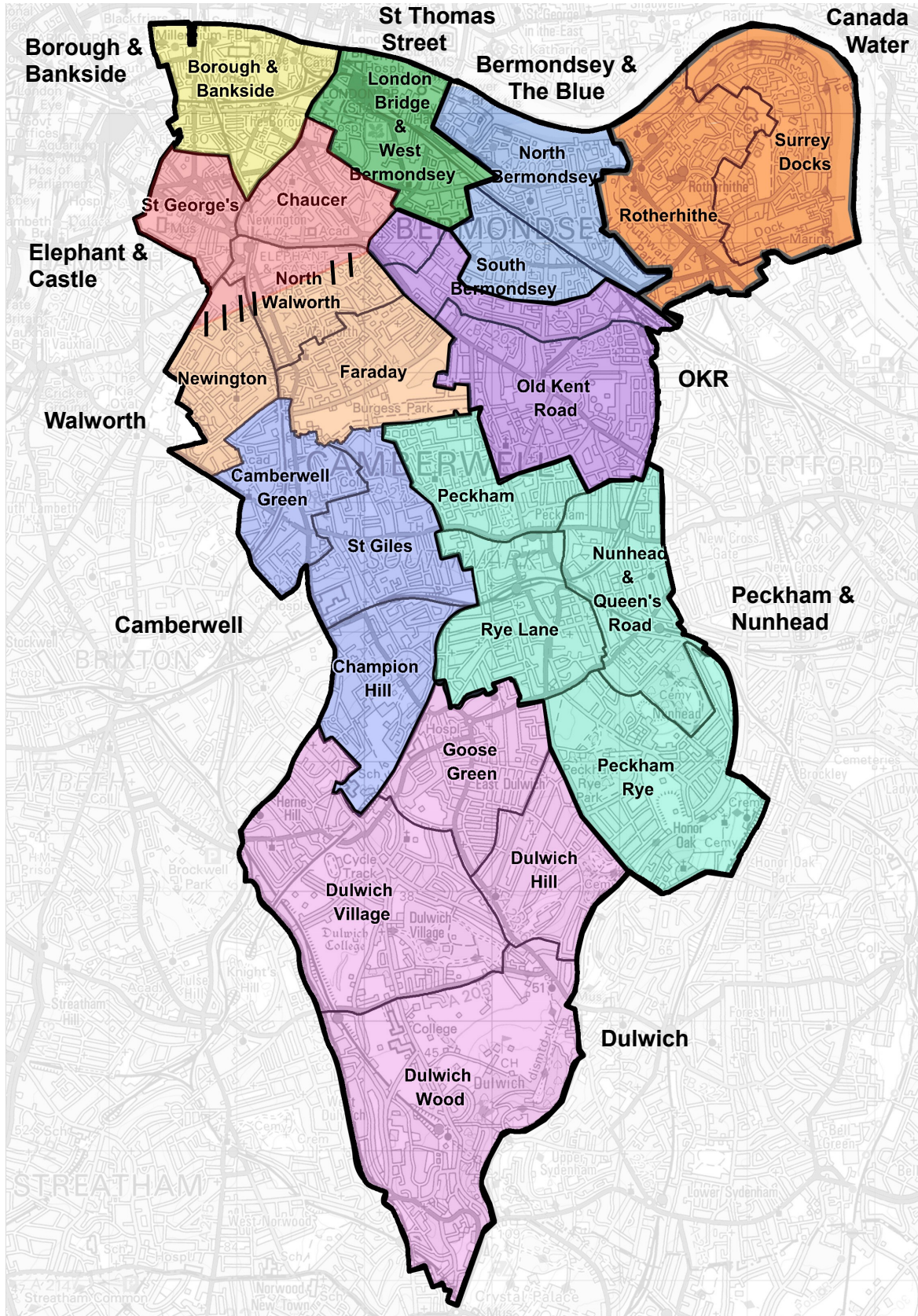


Figure 2: Scope of background paper

1.3 Approach to tall buildings

Development should achieve the highest possible standards of design for tall buildings and create an attractive, distinctive public realm which is safe, accessible and enjoyable. Through considered design, tall building developments should contribute to Southwark's physical and social regeneration goals by increasing the population density, avoiding urban sprawl and offering enhanced activities and life opportunities for existing and new residents.

Many areas within the borough are valued for their own unique character and it is important that development does not have an adverse effect and makes a positive contribution. Areas such as major town centres, opportunity areas and action area cores have the potential to be transformed through new development involving regeneration programmes. The Central Activities Zone (CAZ) provides further opportunities for tall buildings to positively contribute to the distinctive skyline of Southwark and wider London context. The Area Visions section of the New Southwark Plan (NSPL1) establishes our ambitions for the Borough and different areas, which is detailed further through the site allocations which set out our aspirations to improve individual areas.

Due regard should also be given to the potential harm that tall buildings development can have on heritage assets and their setting, microclimate and the environment. Impacts such as overshadowing, overlooking amenity space, wind tunnel effects, noise, interference to aviation, navigation and telecommunication, run off, reflected glare, high energy consumption and carbon emissions should be minimised and eliminated where possible through analysis and required 3D modelling.

Developments will be required to;

- Achieve an exemplary standard of design that creates unique places and makes a positive contribution towards regenerating areas.
- Preserve or enhance Southwark's historic environment, including conservation areas, listed and locally listed buildings, registered parks and gardens and scheduled monuments.
- Carefully manage the design of tall buildings in the Thames Policy Area so that it is sensitive to the many special qualities of the River.
- Ensure the height and scale of development protects and enhances strategic views and is appropriate to its context within important borough views.
- Utilise the Southwark Design Review Panel to assess the design quality of development proposals
- Submit Design and Access Statements, and Environmental Statements with applications. In addition to a list of local validation requirements, such as heritage statements, archaeology statements and 3D models in order to aid assessment of schemes.

1.4 Tall building definition

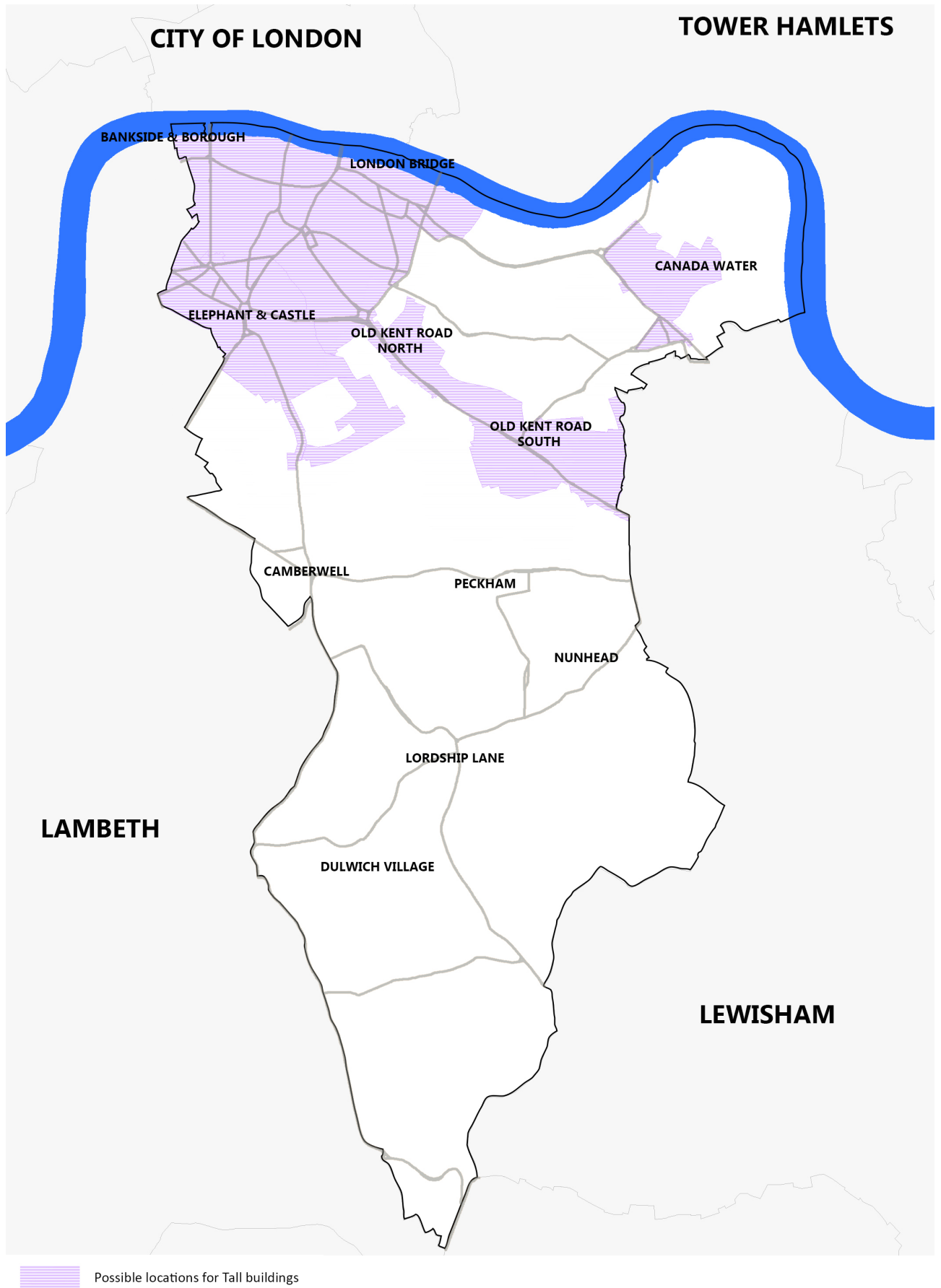
As stated in the New Southwark Plan, tall buildings are above 30m except where they are 25m in the Thames Special Policy Area, and also where they are significantly higher than surrounding buildings or their emerging context.

1.5 Areas Identified as most appropriate for tall buildings

The London Plan requires Development Plans to map the locations where tall buildings will be an appropriate form of development in principle and to indicate the general building heights that would be appropriate. This should be based on the visual, environmental and cumulative impacts of tall buildings and their potential to contribute to new homes, economic growth and regeneration and their public transport accessibility. The areas identified as most appropriate for tall building developments are mapped in figure 3, however applications will be assessed on a site by site basis and other areas might be deemed as suitable where appropriate.

The following section provides a comprehensive overview of the London Plan and other relevant national and regional policy and guidance.

Figure 3: Areas Identified as most appropriate for tall buildings



2 Current Policy Context

This section summarises the key national, regional and local policies and guidance which have informed the P16 tall buildings policy of the New Southwark Plan. Further details can be found in Appendix C.

2.1 National Planning Policy and Guidance

2.1.1 The National Planning Policy Framework 2019 (NPPF)

The revised National Planning Policy Framework ('NPPF') was published in June 2019 and sets out the national planning policy and how this needs to be applied.

The NPPF focuses on sustainable development with three key objectives:

- Economic
- Social
- Environmental.

The NPPF regards the creation of high-quality buildings and places as fundamental to what the planning and development process should achieve. Local planning Authorities should support the efficient use of land and consider a range of minimum density standards, rather than one broad density range, to accommodate different needs within a development plan area. There should be a positive strategy for the conservation and enjoyment of the historic environment. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance

2.1.2 Ministry of Housing, Communities and Local Government National Design Guide 2019

The MHCLG National Design Guide (NSPN2) sets out the ten characteristics of well-designed places and provides case studies to illustrate what good design means in practice. The ten characteristics are grouped into the three themes of Character, Community and Climate, aligning with the NPPF. The guidance acknowledges the positive contribution tall buildings can make to the built environment and advocates a plan-led approach. Tall buildings are said to be well-placed to act as landmarks, emphasising important places and adding variety to the townscape and to the skyline.

When dealing with applications for tall buildings the guidance recommends that special consideration should be given to;

- Their location
- The surrounding context
- Impact on local character, views or sight lines
- Their composition
- Environmental impacts.

2.1.3 Historic England Advice Note 4 2015 and Draft 2020

The Historic England Advice Note 4 (Draft 2020) was first published in 2007, updated in 2015 and is currently out for consultation for a 2020 update.

The 2015 advice note states that whilst tall buildings can be beneficial to city life, they can also potentially harm the historic character of places due to their large scale and widespread visibility. The 2015 version suggest that Local planning Authorities undertake characterisation and building height studies to provide evidence supporting a local height definition for tall buildings.

Appropriate sites for tall buildings are recommended to be identified in the local plan, creating clear strategic policies which will be used to inform development management and supplementary planning advice where appropriate.

The historic context and protection of the historic environment should be considered when dealing with tall building applications. This could include but is not limited to;

- Natural Topography
- Strategic and Local views
- Setting and views of World Heritage Sites, listed buildings, Conservation Areas and Archaeological Priority Areas
- Setting and views of historic parks and gardens, protected open space

The 2020 draft advice note broadly follows the 2015 guidance whilst placing greater emphasis on the importance of a plan-led approach as well as the use of changing technologies to illustrate tall building proposals with more clarity. 3D modelling is highlighted as a useful tool for understanding the impact of tall buildings which can often be within complex developments.

Approaches identified in the guidance is followed through the analysis section and consideration of the historic character and local context of the borough.

2.2 Regional Planning Policy and Guidance

2.2.1 London Plan 2016 and emerging London Plan 2019

The London Plan (NSPR1) sets out a series of key considerations that underpin the Mayor's objectives for London. The 2016 London Plan acknowledged that tall buildings can contribute positively to an area providing development did not cause unacceptable harm to its surroundings and forms part of a plan-led approach. Policy D8 of the draft 2019 New London Plan (NSPR2) further emphasises the potential for tall building developments to facilitate regeneration opportunities and manage future growth.

The 2016 Plan limited the appropriate locations of tall buildings to within the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport. However, the 2019 Plan allows the boroughs to decide where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan.

The areas should demonstrate;

- The capacity of the area and its transport network is capable of increasing to accommodate the increased users from intensified development.
- The regeneration potential of tall building development as a catalyst for further change
- High quality of architecture and design, mitigating adverse environmental impact.

Considerations need to be had in regard to

- Impact on local context and character
- Impact on Heritage assets
- Impact on Strategic and Local views
- Impact on Thames Policy Area where applicable

The appropriate locations of tall buildings and building heights should be identified on maps in Development Plans. Boroughs can also set their own definition of what constitutes a tall building depending on its local context.

In large areas of extensive change, such as Opportunity Areas, the threshold for what constitutes a tall building should relate to the evolving (not just the existing) context

2.2.2 London View Management Framework (LVMF) Supplementary Planning Guidance 2012

The London View Management Framework (NSPR3) maps the strategic views identified in Policies 7.11 and 7.12 of the London Plan 2016 (NSPR1) and Policies HC3 and HC4 of the London Plan (2019) as well as strategically important landmarks such as World Heritage Sites. The LVMF sets out how these views will be protected and how the impact of new development will be assessed. This states that developments located within a strategic view should provide a comprehensive massing analysis of the potential impact on the protected view. New development should avoid harming a designated view and make a positive contribution to the skyline.

There are three types of Strategic Views designated

- London Panoramas
- River Prospects
- Townscape Views (including Linear views).

2.3 Evolution of Southwark Local Plan's Tall buildings Policies

Southwark Development Plan	Policy Changes After Consultation
Southwark Plan Saved Policies (2008) Policy 3.20 Tall buildings	Adopted tall buildings policy sets out the tall buildings design criteria and locational requirements.
Core Strategy (2011) Strategic Policy 12 – Design and conservation	No major changes were apparent in this adopted document apart from revised approach to tall building locations, and the emphasis on conserving and protecting historic heritage in the borough.
NSP Options (2014) DM45 Tall Buildings	The definition of tall buildings was revised and included a sliding scale of design requirements that are height dependent. Policy stated that tall buildings should be located within regeneration areas.
NSP Preferred Options-DM (2015) DM12 Tall Buildings	The tall buildings policy had been refined with updated locational criteria that focuses the tallest buildings on the cores of regeneration areas and the Central Activities Zone. The policy was also updated with a new definition of what a tall building is and a series of design criteria that must be met.
NSP Proposed Submission Version (2017) P14 Tall Buildings	The proposed submission version of the tall buildings policy had not changed much in principle from the previous versions. The only evident change is that it stated the highest tall buildings would typically be located in Southwark's major town centres, Opportunity Areas and the Central Activities Zone.
NSP Amended Policies (2019) P14 Tall Buildings	The amended policies version of the policy introduced a map in relation to the location of appropriate areas for tall buildings. This provided further clarity on location of tall buildings.
NSP Submission Version (2020) P16 Tall Buildings	The final submission version has included a fact box which states our tall buildings definition. The policy requirements specific to developments 30m and above have now been updated to apply to all tall buildings. Following this is the reasons section which has now been updated to clearly set out the supporting elements for this policy which are requested in the London Plan. There is also clarity in this section of the Area Visions that have detailed guidance for tall buildings in the associated site allocations.

3 Existing Context of Tall Buildings

This section sets out the existing context of tall buildings and building heights in the borough and the surrounding area.

3.1 Tall Buildings in London Borough of Southwark

Southwark is an inner city borough with various Major, District and Local Town Centres spread throughout. The borough includes areas of open space, suburbia, riverside flats, Victorian terraces, modern offices, some of which have significant historic value and are located within conservation areas. In Southwark the heights and scale of development differ greatly from the north which is more urban, with riverfront modern commercial development through to the suburban, terraced houses of the conservation areas further south in the borough.

The existing range of building heights in the borough, as shown in figure 8, illustrate that tall building development has generally gravitated towards riverfront areas such as Blackfriars Road, Bankside and London Bridge, major transport interchanges such as Elephant and Castle, around 1960s-70s social housing estates such as the Aylesbury, opportunity areas such as Old Kent Road and town centres such as Peckham and Canada Water.

The riverfront areas of Blackfriars Road, Bankside and London Bridge provide an established height for buildings fronting the river with a number of prominent buildings visible on the skyline including Tate Modern, Kings Reach Tower, Guy's Hospital Tower, New London Bridge House and the Shard. There have been a number of consents for tall buildings applications in Blackfriars Road and Bankside, including One Blackfriars Road, 20 Blackfriars Road, Neo Bankside, and the turbine hall extension of the Tate Modern. The Shard which stands at 309.6 metres, has formed a new pinnacle within the existing cluster of tall buildings around London Bridge station and Guy's Hospital. This tall building has redefined the skyline of the area, making London Bridge a focus for new tall building development.

Standing at 309.6m high and designed by Renzo Piano, The Shard has become the focus point of the existing tall buildings cluster around the London Bridge area. At 96 storeys, it is the tallest building in the UK and the sixth tallest in Europe. Other recent tall buildings to be built in these areas include One Blackfriars Road, 20 Blackfriars Road and Neo Bankside.

Elephant and Castle has a number of tall commercial and residential buildings focused around the train, tube and bus station. The regeneration will see the replacement of the existing Heygate Estate and shopping centre, as a result of retail and residential being provided in new tall building developments. There have also been a number of approved tall residential buildings in E&C, including the Strata tower also known as 'The Razor', with newer additions including the Highpoint development, which is the tallest build to rent building in the country.

Southwark also has numerous late twentieth century social housing estates which are tall in parts, such as the Aylesbury Estate, Kipling Estate, Dawson Heights and Four Squares. These estates contain a range of building heights including point blocks surrounded by communal open spaces and vehicle circulation, deck access medium to high rise blocks with segregation of pedestrians on walkways above the ground, and inter-war medium rise 'walk-up' blocks. The current regeneration proposed for the Aylesbury Estate will increase the efficiency of the land use and introduce a new scale of residential housing with new public realm.

In the Old Kent Road area, there are three clusters of tall estates each of three point blocks from the 1950s and 60s

- Tustin Estate: 18 storey towers of Windermere Point, Ambleside Point and Grasmere Point
- Ledbury Estate: 14 storeys towers of Skenfrith House, Peterchurch House and Sarnesfield House
- Avondale Square Estate: three 21 storey towers of East Point, Centre Point and West Point.

There are also a pair of 14 storey towers near South Bermondsey station, which are part of the Rennie Estate. There is however no overall pattern; the tallest point blocks were often consciously set alongside lower slabs (on the Roehampton model) providing visual contrast as well as a mix of accommodation. The recent addition of the Area Action Plan has led to the approval of nine developments with tall buildings since 2015. The approvals follow the Bakerloo Line extension along the Old Kent Road.

Largely uninterrupted Victorian terraces cover a significant part of the borough with the most continuous areas being East Dulwich, Nunhead, Herne Hill, Camberwell North, Camberwell Church Street and Peckham Road. Buildings here are typically two to three storey terraces with rear gardens and small front areas.

There are a number of prominent, well designed taller buildings in Peckham and features such as Peckham Library, the tower of the former Jones and Higgins building, the Bussey Building and Co-Operative House. Each of these buildings currently marks a focal point at the convergence of main routes in and out of Peckham and/or is a landmark making a positive contribution to the landscape.

Where there are opportunities for infill developments in these areas, especially on industrial sites and surrounding commercial property, the proposals may be slightly taller than its surroundings due to schemes needing to make efficient use of the land. Here, buildings would be considered as 'tall' at less than 30m (approx 10 storeys).

Case Studies: Recently approved tall building developments in the Old Kent Road Area



Ruby Triangle

Usage: Residential-led, mixed use
 Height: 171m, 48 storeys
 Consented: 2019
 Image: Farrells



Southerwood

Usage: Residential-led, mixed use
 Height: 259m 48 storeys
 Consented: 2019
 Image: Pilbrow & Partners



596 - 608 Old Kent Road

Usage: Residential-led, mixed use
 Height: 139m, 39 storeys
 Consented: 2019
 Image: AVR London

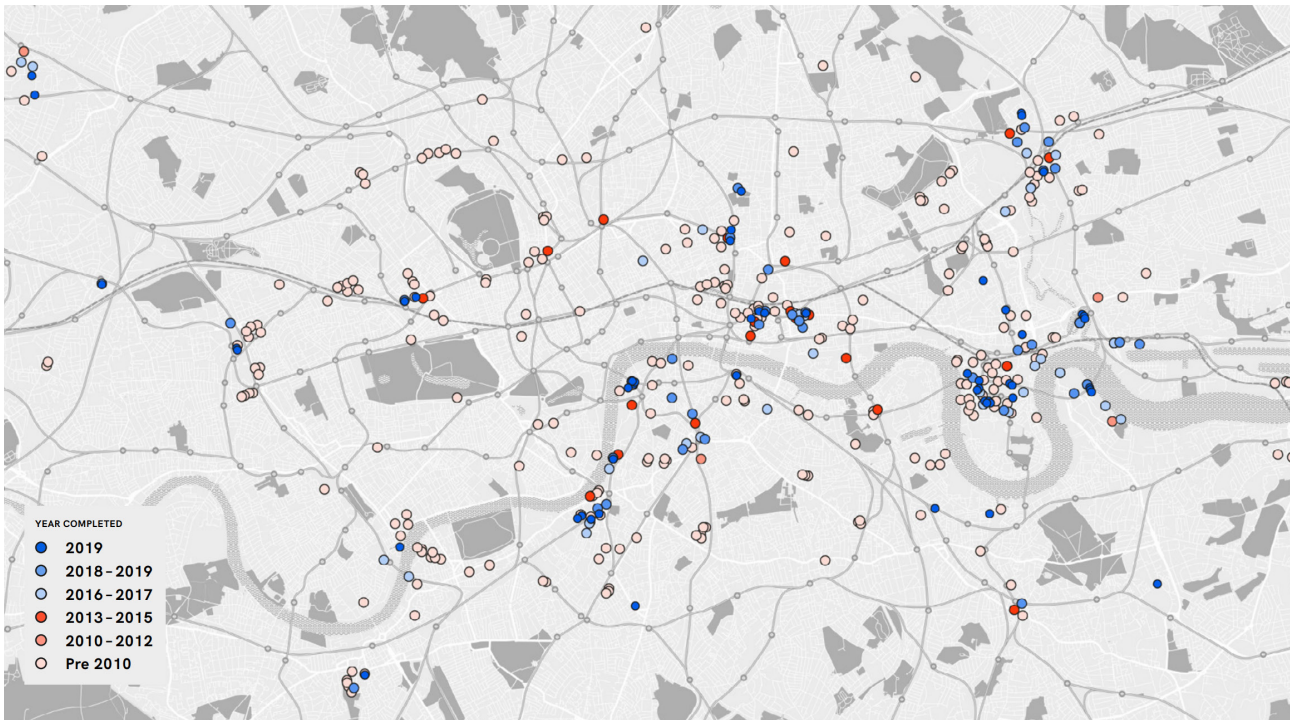


Figure 4: Recent completed tall buildings in London. Source: NLA Tall Buildings Study 2020

3.2 Tall Buildings in the Surrounding Area

London Borough of Southwark is bordered by six different boroughs;

- Tower Hamlets and City of London to the north, separated by the River Thames
- Lewisham to the east
- Lambeth to the west
- Bromley and Croydon to the south

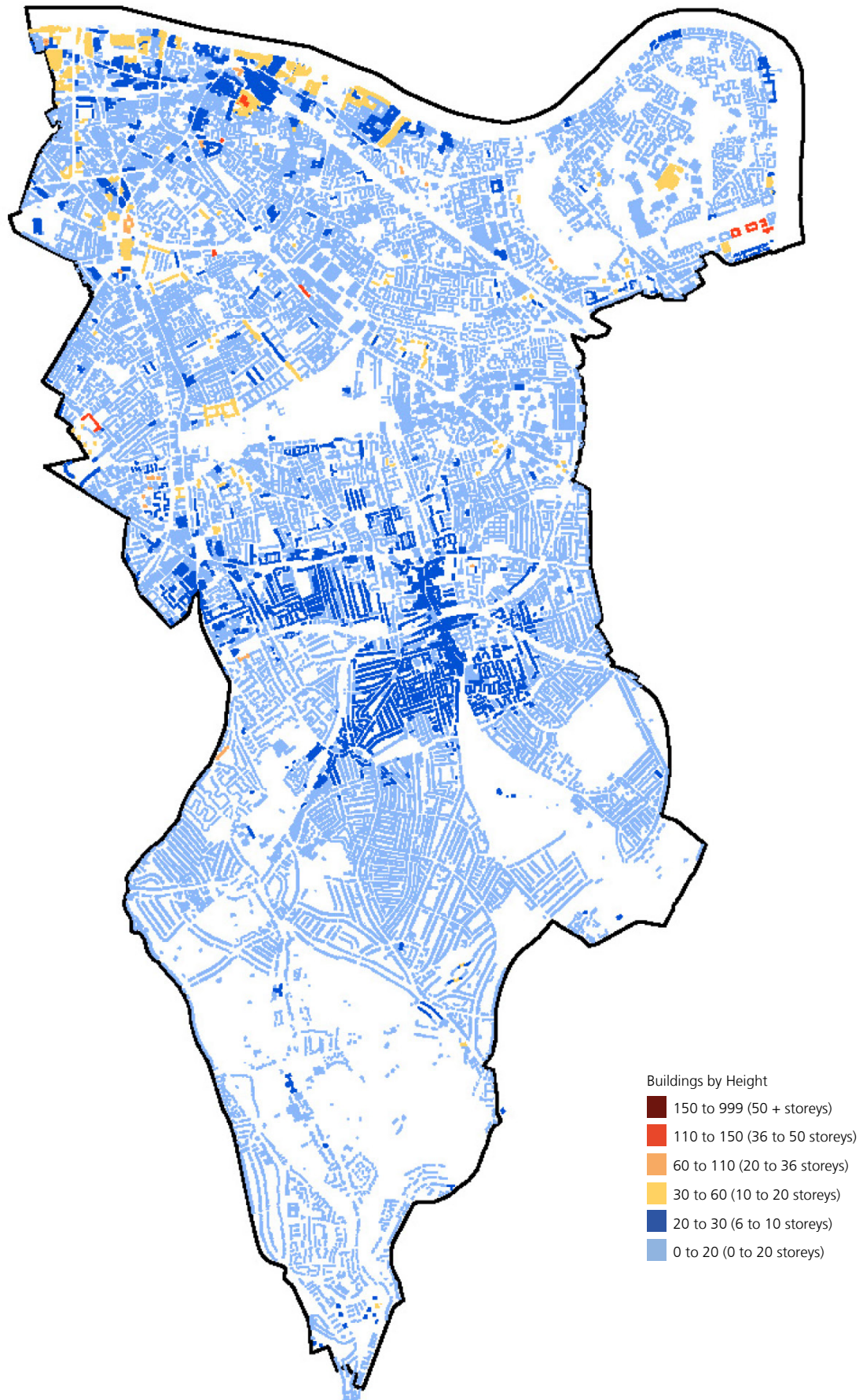
Existing tall buildings in the area surrounding Southwark are mainly concentrated near the River Thames. The City of London has a cluster of tall buildings, visible from the northern edge of the borough, which have come to define the London skyline including The Gherkin (30 St Mary's Axe), Tower 42, The Cheesegrater (122 Leadenhall Street) and The Walkie Talkie (20 Fenchurch Street). There are several tall buildings under construction in this area including 22 Bishopsgate which at 62 storeys will be the second tallest building in London after The Shard. Opposite Bankside, landmark buildings such as St. Paul's Cathedral are also visible as well as other iconic developments such as the Barbican and Centre Point.

To the east, the financial district of Canary Wharf provides a cluster of tall buildings which are also prominent on the city's skyline and easily viewable from the riverfront in Southwark including One Canada Square, 8 Canada Square, Newfoundland Quay and Lanmark Pinnacle, one of the tallest residential tower in London.

The neighbouring borough of Lambeth has set a recent precedent for tall building developments along the riverfront with approvals including Nine Elms Points, The Corniche, Embassy Gardens, Vauxhall Sky Gardens, Doon Street, St George's Wharf Tower and Merano Residences.

Further down the river from London Bridge is the UNESCO World Heritage Site, The Tower of London, along with Tower Bridge. Both of these sites are identified as strategic and heritage landmarks, providing a focal point for historic and cultural activities on the north bank of the River Thames.

Figure 5: Building heights



4 Analysis: Most appropriate locations for tall buildings

This section provides the rationale behind Southwark's identification of the most appropriate locations for tall building developments in the borough. The section has further informed the Implementation Strategy (Appendix D) to ensure tall buildings are only approved in the most applicable areas.

4.1 Proximity to existing major transport nodes

The densest forms of development, including tall buildings should be located in the most accessible locations, including, Central Activity Zones, Opportunity Areas and Major Town Centres. This enables the maximum benefit, in terms of housing and employment capacity to be derived from the investment in existing and new public transport provision. Existing and planned transport capacity should be planned in such a way to support the scale of development proposed

The Mayor's Transport Strategy (NSPR4) identifies several major public transport nodes located within the borough's 'focus area', where transport can be an enabler of significant change. The transport nodes are primarily located in areas with the potential to develop transport infrastructure, the main growth opportunity areas and action area cores.

New public transport interchanges will be constructed soon in;

- Old Kent Road
- South Bermondsey

Existing major public transport nodes being located in:

- London Bridge
- Elephant and Castle
- Canada Water
- Peckham Rye

There are several improvements that have been completed to the Thameslink Programme which serves a large area of the borough.

These are identified as:

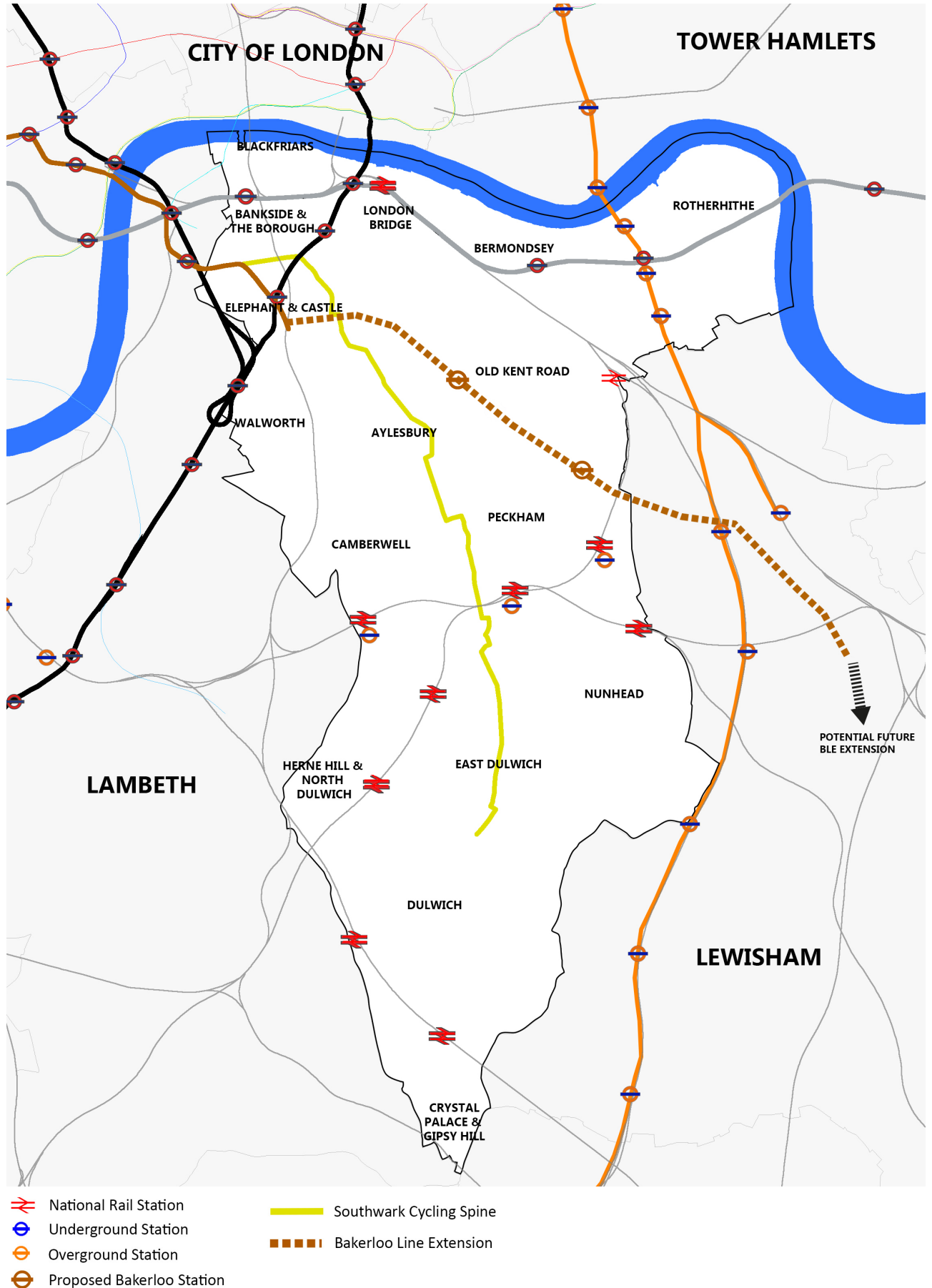
- Thameslink improvements and Jubilee Line upgrade making London Bridge Station one of the most important transport nodes in the capital.
- Upgrade to the train station, tube station and bus interchange at London Bridge
- Blackfriars Station redevelopment providing a new entrance on the South Bank at Blackfriars Road North.
- Improved interchange between Jubilee line and Overground to relieve congestion at peak journey times

The following improvements currently in progress or in the near future include:

- Increasing the capacity of the East London Line from 16 trains per hour to 20, with the addition of a new station (Surrey Canal Road / New Bermondsey) in 2023 linking Peckham to Shoreditch.
- Upgrade of Surrey Quay's station to provide step free access and new entrance from north side of Lower Road from within the Canada Water emerging town centre.
- Maintenance and capacity improvements to Northern, Jubilee and Bakerloo Lines
- The Bakerloo Line Extension through Old Kent Road – 2 new stations
- New single Elephant and Castle underground station to provide fully step free access and integration between Northern Line, Bakerloo Loo and Bakerloo Line Extension.

Figure 4 shows the existing public transport network and the proposed improvements to transport connections around transport nodes and established gateways

Figure 6: Existing public transport network and proposed improvements



4.2 Gateways, junctions of major roads, town centres and points of civic or local significance

Due to the scale of tall buildings, they can often become landmarks and prominent features on the borough and wider city skyline. Tall buildings should be of exemplary architecture and aim to raise the profile of the area as well as adding interest to the skyline.

They are deemed most suitable, therefore, in locations where this landmark status can emphasise a point of civic or visual significance.

These locations could be main gateways and entrances into the borough or locations where prominent buildings can be viewed from the river, or at junctions of major roads.

There are several key gateways, major junctions and points of local significance that can be identified in the borough, including;

- The Borough, Bankside and London Bridge opportunity area located on the riverfront, forming a gateway entrance to Southwark from the City of London.
- Elephant and Castle located at a gateway and major junction point connecting the north of the borough to the south.
- The Canada Water Dock located at a point of local significance

Case Study: One Blackfriars

One Blackfriars is a prominent example of landmark architecture in Southwark, redefining the borough and London skyline.

The tower's distinctive form is emphasized by its double skin façade and the curved outer skin gives it a smooth and dynamic appearance.

The development provides 274 homes which offer panoramic views of the capital.

There are various shops and restaurants at ground level as well as the 161-bedroom Bankside Hotel. The public plaza allows everyone to experience the space and provides vibrant public realm.

Address: 1-16 Blackfriars Rd, South Bank, SE1 9GD
Completed: 2019
Usage: Residential and retail.
Height: 170 meters (50 floors)
Consented: 2012



4.3 Potential for new open space and public realm

As a major development, tall buildings provide the opportunity to improve the existing surrounding public space, improving the permeability of an area and benefitting the existing local community. Tall building would be most appropriate in areas where development can provide new open space, enhancing the public realm on offer.

Consideration needs to be taken to how a tall building is designed to meet the ground and how effectively it interacts and integrates within the existing streetscape.

The Open Space Strategy (NSPL12) sets out expectations for new developments to meet and can be seen implemented within the borough in the following examples;

- An enhanced public realm and streetscape around Bankside, Borough and London Bridge Opportunity Area
- New open space and public realm for the Elephant and Castle regeneration area
- New public realm and green space within the Aylesbury Estate Area Action plan
- New town centre public realm at Canada Water, detailed further in the Canada Water public realm improvements study (NSPL22)
- Enhanced streetscapes and new public spaces at Peckham, detailed further in the Peckham and Nunhead Area Action Plan open spaces background paper (NSPL13)

Future improvement opportunities:

- Enhanced streetscapes and new connections to green spaces, detailed further in the Old Kent Road Area Action Plan (NSPL6)

4.4 Focus for regeneration and new large-scale development and investment

Tall buildings are major developments and can be catalysts for large-scale investments in infrastructure, transport, public realm and community facilities. Tall buildings can act as a lynchpin for the regeneration of an area, unlocking potential and increasing the attractiveness for investment, benefitting the local community and economy. Major companies can also be drawn to the large commercial spaces and will spend money in the area, as well as the visitors who will come by the building.

Regeneration reflects the Mayor's aspirations for good growth in London which is set out in chapter 1 of the draft New London Plan (NSPR2). The development of an area can facilitate regeneration opportunities and future growth alongside contributing to new homes and economic growth.

Developments which have the potential to change and improve social, physical, green and transport infrastructure creates the opportunity for a new, enhanced environment that responds to the changing needs of Londoners, and is good for growth, appropriate to the location.

Case Study: Elephant Park

The use of a tall building as a pivotal focus for regeneration can be seen within the Elephant and Castle regeneration project at Elephant Park.

The scheme is a major mixed-use development with residential units and student accommodation. The scheme is also comprised of a new park, a new shopping centre and retail spaces. The retail units will be situated at ground floor, activating the streetscape and open spaces. This new and improved public realm allows for the integration of the existing pedestrian thoroughfares which remain as clear wayfinding routes.

The scheme aims to build nine taller buildings, of which four have already been built. In total, the regeneration scheme will bring in 3,000 new homes with 25% affordable housing, space for over 50 new retail units and offer 6,000 new jobs with 5,000 in construction, and 1,000 in completed development. The injection of investment is a prime example of a tall buildings within regeneration schemes can allow a place to function more effectively. The remaining buildings within this regeneration scheme yet to be built can be seen overleaf.



Trafalgar Place

Address: Rodney Rd, SE17 1AS
Completed: 2015
Usage: Residential
Height: 10 storeys Image: dRMM



South Gardens

Address: Heygate St, SE17 1FP
Completed: 2017
Usage: Residential
Height: 16 storeys

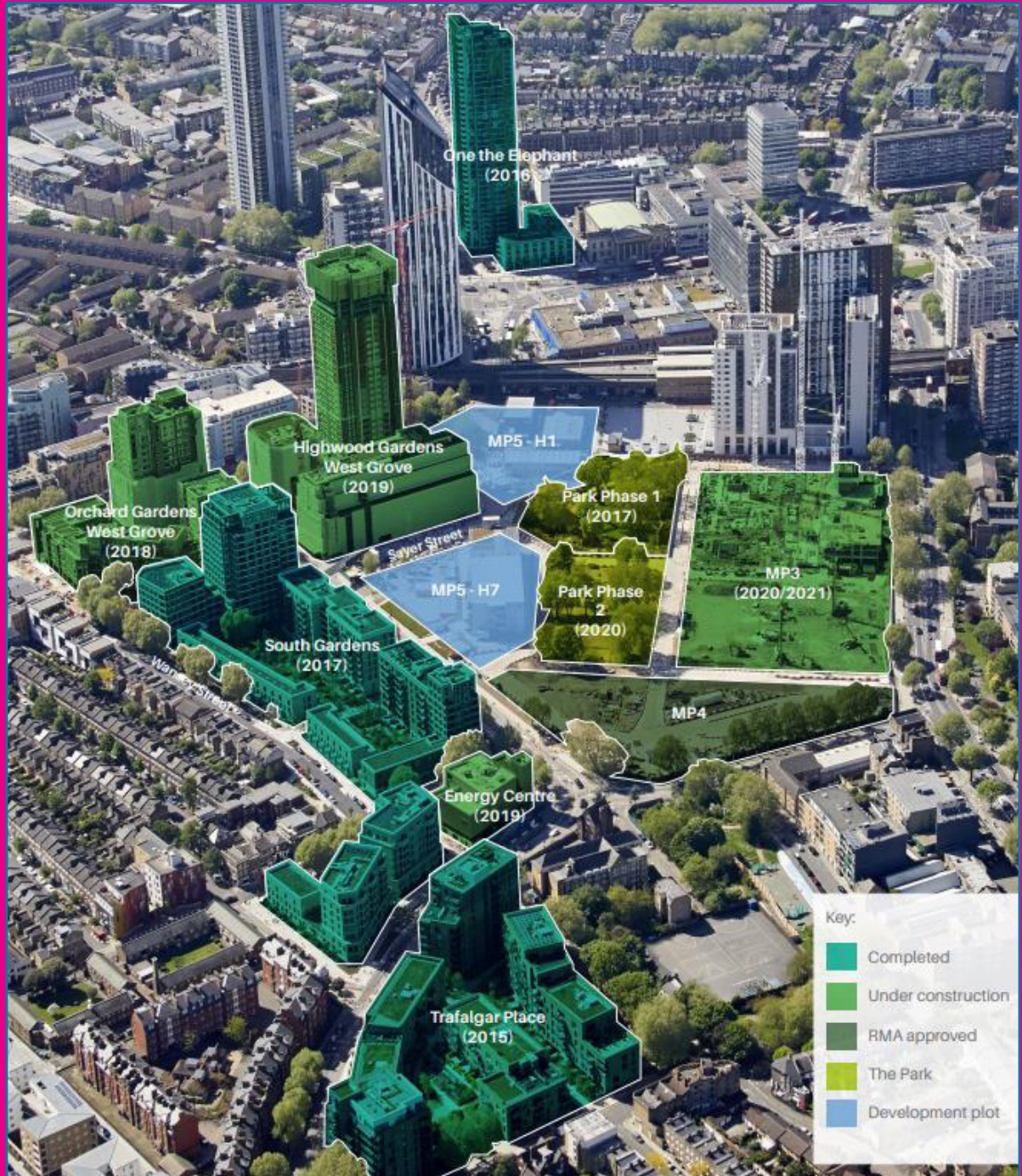
Image: Maccreeanor Lavington



One the Elephant

Address: Brook Drive, SE1 6SQ
Completed: 2016
Usage: Mixed Use
Height: 123.3m, 37 storeys
Consented: 2012

Remaining buildings within the Elephant and Castle regeneration scheme



Sites that have been deemed appropriate for large-scale, intense development through site capacity studies can provide the opportunity for mixed-use tall buildings. The potential of mixed use buildings creates the platform for all to benefit from new development.

The introduction of residential units and office spaces that sit above ground floor podiums creates distinctive, vibrant high streets that can maintain existing uses and implement the need of new uses in areas such as retail and shared workspaces.

Mixed use tall buildings offer the potential for all to benefit from new developments. Having retail or leisure units at ground level helps create distinctive, vibrant high streets whilst allowing for commercial spaces or housing needs to be met and optimised on the upper floors.

The optimisation of housing can be achieved through following the requirements of the draft New London Plan (NSPR2) policy D2- Delivering good design, to maximise the capacity of sites to deliver higher density buildings.

Intense mixed use developments will only be accepted where a high standard of design quality is achieved and the use of sustainable technologies and materials are evident.

Case Study: Bankside 123

Bankside 123 demonstrates how tall buildings allow for flexible uses on the ground floor, whilst providing needed commercial spaces on the upper floors.

Bankside 1 (Blue Fin Building), is the first and largest of three new buildings with a gross internal area of 697,000 sq ft.

The building consists of high specification office space with retail and leisure facilities at ground floor level. Bankside 2 and 3 have a combined gross internal area of 588,000 sq ft and have been let entirely to the Royal Bank of Scotland as their new London Headquarters.

The variety of retail and leisure facilities on the ground floor of Bankside 1 not only opens up the whole development to the office users and RBS employees yet also residents and visitors to the area.

This demonstrates how mixed use tall buildings can activate the ground floor of an area, creating a thriving public realm and destination landmark which people will travel to.



Address: Bankside 123, 110 Southwark Street, SE1 0SU
Completed: Bankside 1 2005
Bankside 2 & 3 2007
Usage: Commercial office, shops, fitness center, RBS bank
Height: 58.30 m, 13 floors above ground, 3 floors below ground

Image: Allies and Morrison

5 Analysis: Considerations for tall buildings

This section explores considerations which need to be taken into account when proposing tall building developments and provides an explanation on why some areas of the borough are more suited to large scale schemes than others.

5.1 Topography

Developments which are significantly taller than its surroundings will occupy a prominent position on the skyline, often visible from afar. New tall buildings should consider the relationship and height of proposals within the local context of Southwark's varied topography as heights which are appropriate in one area might appear overly dominant in another. This would also include any potential impact on strategic or borough views in relation to the city's topographical landform.

The north end of the borough is considerably lower than the south, rising from the tide line of the River Thames. There are higher points towards the southern end of the borough, for example at Dawson Heights and One Tree Hill. These higher elevations offer views which stretch across the borough and central London. The topography tapers at the point where the south, east and west boundaries meet the neighbouring boroughs of Croydon and Bromley.

Across the river to the north, the land is at a considerably higher elevation in the City of London and Tower Hamlets in comparison with the surrounding area. As a result, St. Paul's Cathedral occupies a significant position on the skyline, especially when viewed from the south. When viewed from the north, the Cathedral is still dominant, with the northern part of Southwark such as London Bridge and Canada Water sitting lower in the backdrop. As a strategic historic landmark, the views of St. Paul's Cathedral are protected. At the UNESCO World Heritage Site, The Tower of London, the land remains elevated with the London Bridge area including the Shard, predominantly visible in the backdrop of the southern views.

5.2 Borough views

The varied topography of Southwark offers views across the borough that are of great local importance. These could be views which allow the image and built environment of the borough to be both recognised and appreciated, or views which enhance wayfinding around Southwark or wider London. Certain points in the borough offer panoramic views across Southwark, often with strategic landmarks or Central London on the skyline. For example, St. Paul's Cathedral and the Palace of Westminster are clearly visible from the high point of One Tree Hill. Other streets and spaces offer more focused, linear views, framing strategic landmarks for example the view of St. Paul's Cathedral from Nunhead Cemetery, and the view of its dome from Camberwell Road.

Broader or more general views also allow an appreciation of the local setting and character of an area, contributing to the enjoyment and experience of local landmarks, heritage assets and open spaces. At the north of the borough, there are identified river prospect views with Guy's Hospital, The Shard, Blackfriars Road and the City of London tall building cluster visible on the skyline. Borough townscape views from Millennium Bridge, looking south towards the Tate Modern, provide a unique framing of distinctive volumes, distinguishing between the historic and contemporary townscape of equal importance.

These considerations are explored in more detail in the New Southwark Plan - Annex 4: Borough Views (NSPL2) in support of strategic policy P19 of the New Southwark Plan (NSPL1), which is detailed to ensure that tall building development, considers borough views.

Figure 7: Topography

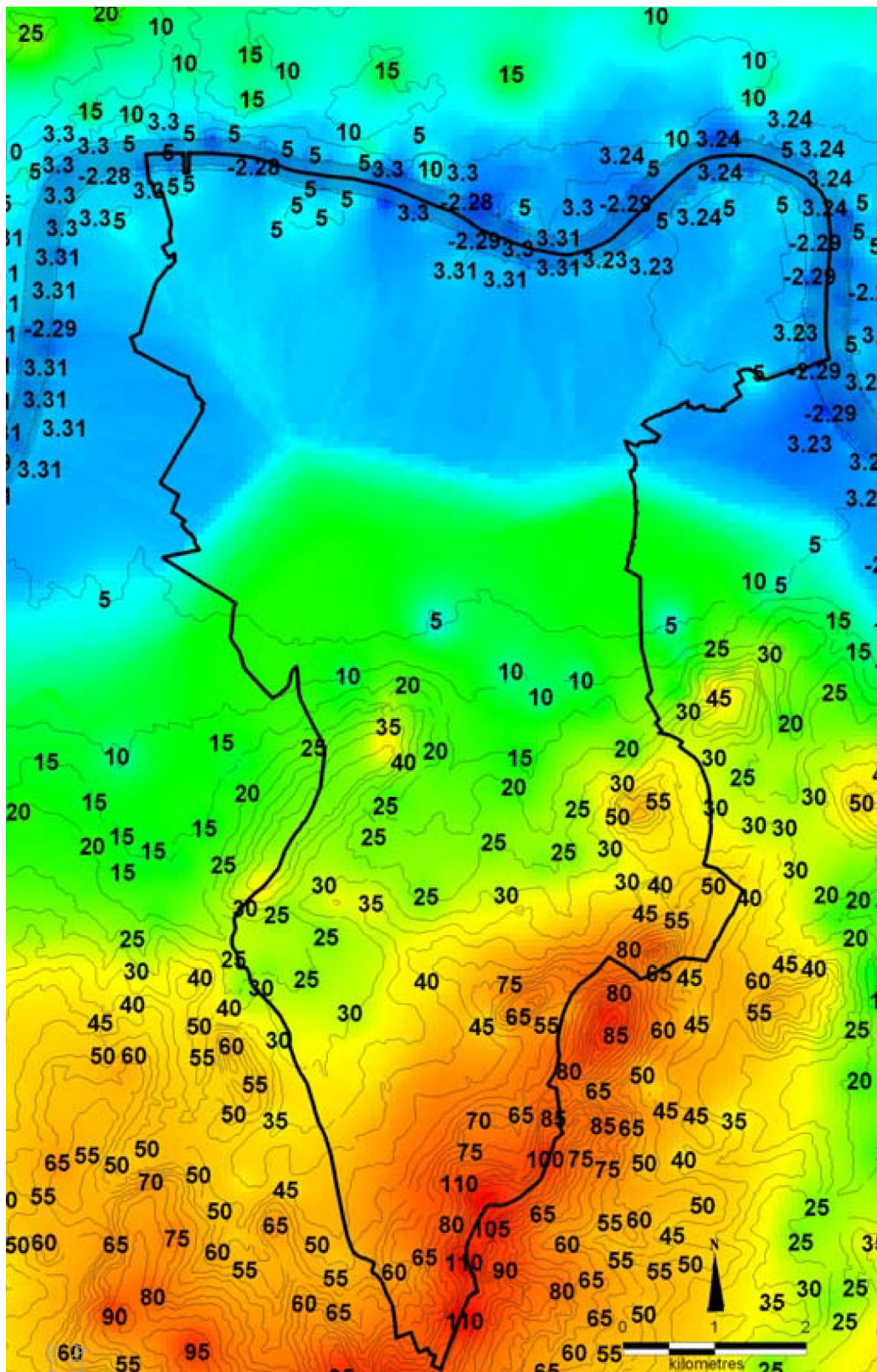
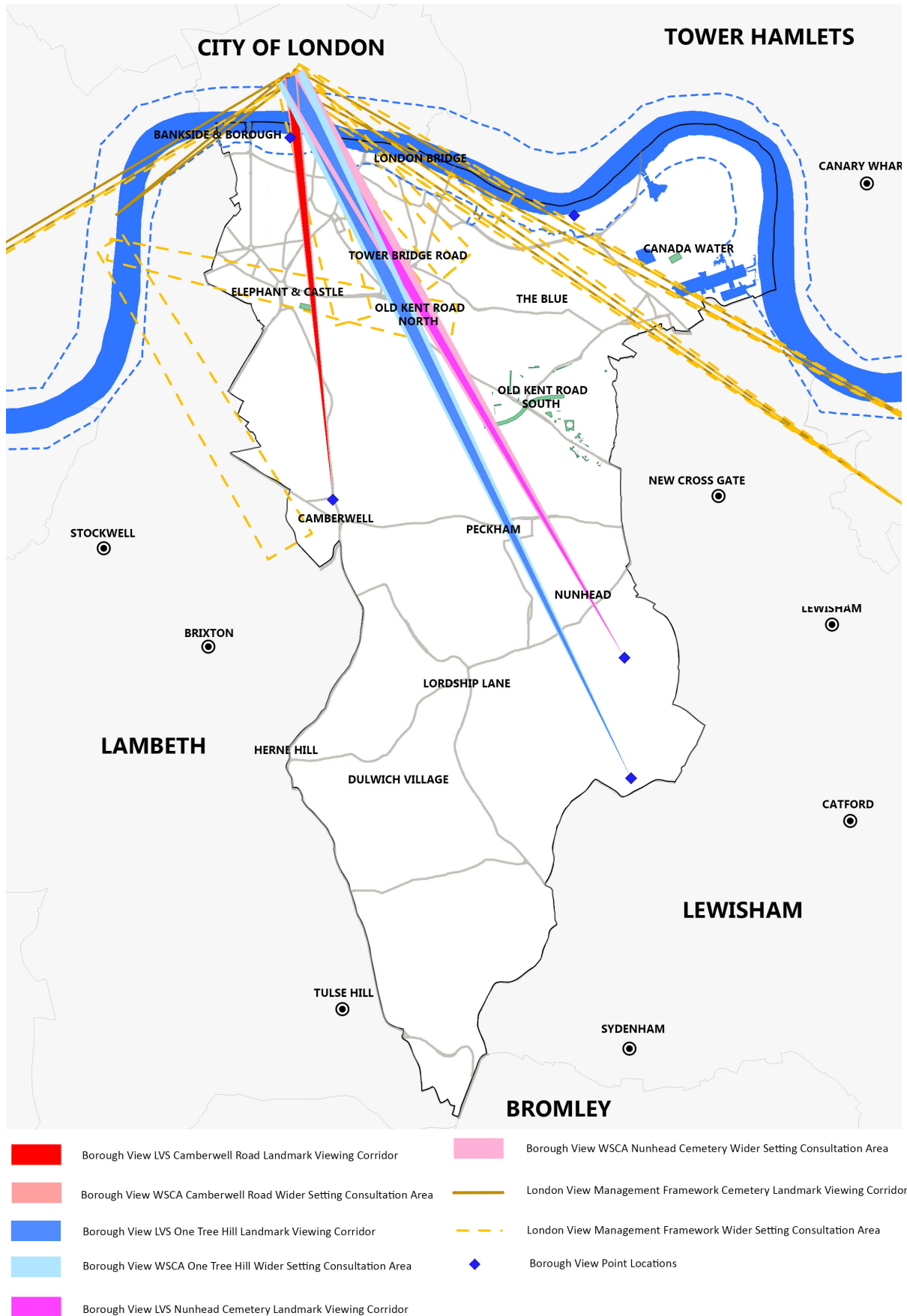


Figure 8: Strategic and Borough Views



5.3 Strategic Views - London View Management Framework

Tall building development would have to be sensitive to its wider context if located within a strategic view. The London View Management Framework SPG (NSPR3) provides more detailed guidance on protected views and how the impacts of new development will be tested.

There are several strategic views which impact on the northern part of the borough. These include strategic landmark viewing corridors such as St. Paul's Cathedral, river prospect views and townscape views. The protected views cover areas including the Bankside, Borough and London Bridge Opportunity Area, Elephant and Castle, Old Kent Road and Canada Water.

Figure 6 shows the strategic views that impact on the borough and the strategically important landmarks as identified in the London Plan.

5.4 Setting and views of the World Heritage Sites

Tall buildings would be required to consider the impact new development would have on the setting of nearby UNESCO World Heritage Sites which are designated heritage assets. In the context of Southwark, this would include the Tower of London, across the river to the North and Palace of Westminster, across the river to the West. New developments would have to undertake an assessment showing the extent of impact on the views of, and from the designated heritage assets and their settings, as stipulated in the London Plan.

5.5 Setting and views of heritage assets

Tall buildings can be overbearing and harmful to the historic environment when there is little consideration of the existing scale and building heights of the local context. New developments should preserve or enhance the character and setting of designated assets of historical and architectural significance.

Tall buildings will not be appropriate where they cause significant harm to a heritage asset or its setting. New schemes will be assessed on balance with the existing scale of an area, existing building heights and the local context and character to ensure tall buildings are appropriate within the setting of the heritage asset.

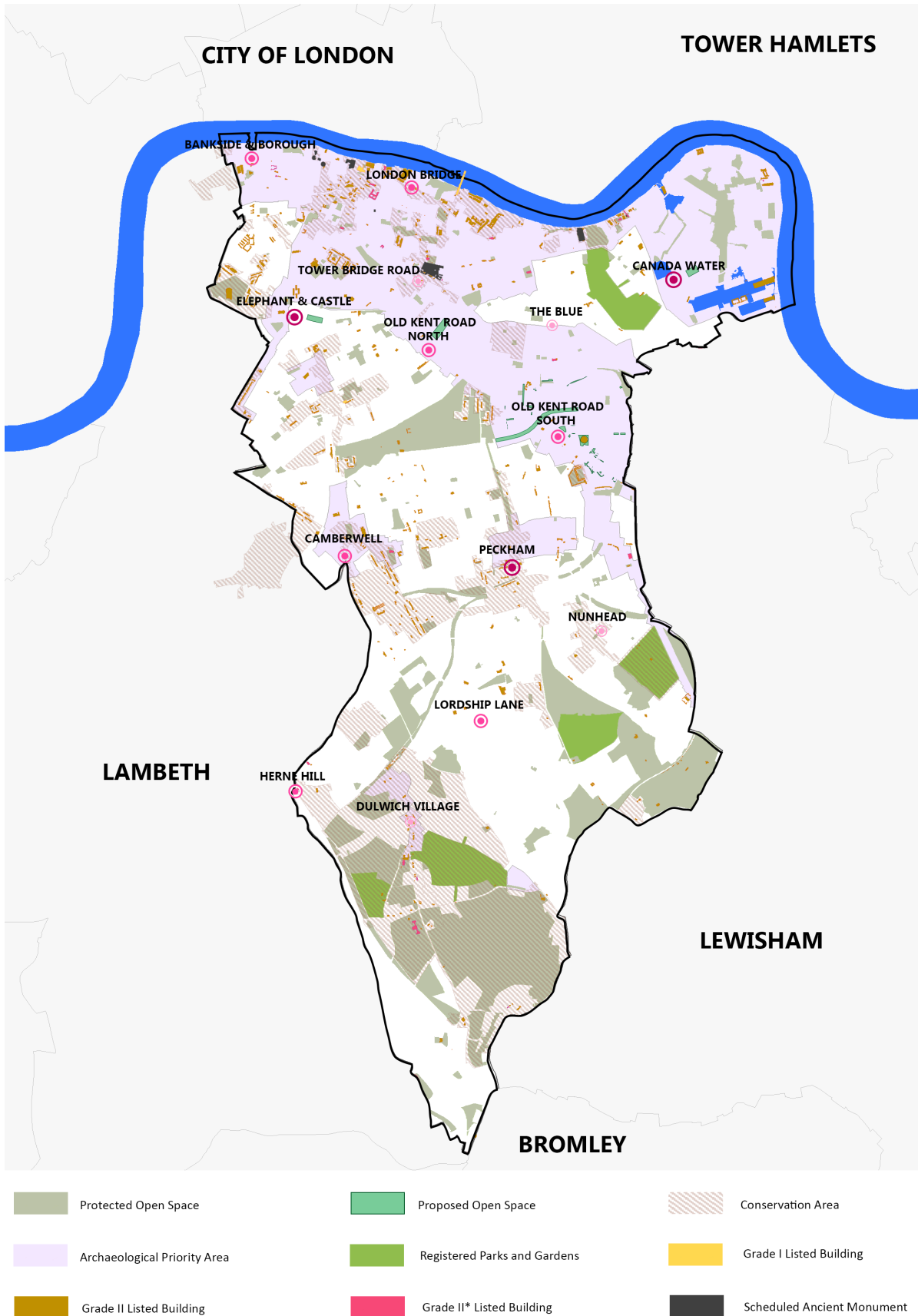
These heritage assets include Conservation Areas, Listed Buildings, Archaeological Priority Areas and Scheduled Ancient Monuments.

5.5.1 Conservation Areas

Southwark currently has 48 conservation areas, varying in character and building styles across the borough. In the north of the borough there are more modern commercial developments interspersed within the conservation areas such as Tooley Street, near London Bridge. The northern conservation areas have a denser built form and have more refurbished heritage assets which are used as commercial or retail units. In contrast, the conservation areas in the south of the borough have a lower scale of development and are more residential in character.

The importance of a conservation area is drawn from the special character of the ensemble of buildings within and unique to that area. The character, building scale and heights of the more urban conservation areas in the north of the borough differ greatly to those in the south and vice versa, yet they are equally important and worth of preservation. When considering the potential harm tall buildings can have on conservation areas, the whole area needs to be assessed accordingly. The council undertakes Conservation Area Appraisals (NSPL59 to NSPL106) which illustrate why an area is of historic and architectural significance and identify its special characteristics and views that need protecting.

Figure 10: Heritage Assets



5.5.2 Listed Buildings

Only a very small percentage of Southwark’s buildings are listed. The purpose of listing is to make sure that the special interest of these buildings is considered in decisions affecting their future. In order to protect Southwark’s built heritage, special planning controls apply to listed buildings.

Southwark has approximately 1,000 entries on the National Heritage List, but these also include one entry for multiple properties. In total, there are over 3,000 buildings and structures which are listed within the borough. Listed Buildings range from: houses, schools, offices, railings walls and gates, tombstones and monuments.

Tall building developments should consider the level of harm that will be caused to a listed building and its setting, demonstrating how this harm is less than significant. Conservation area appraisals (NSPL59 to NSPL106) and characterisation studies (NSPL16 to NSPL20) may indicate views of and around listed buildings which should be considered as part of the assessment of harm.

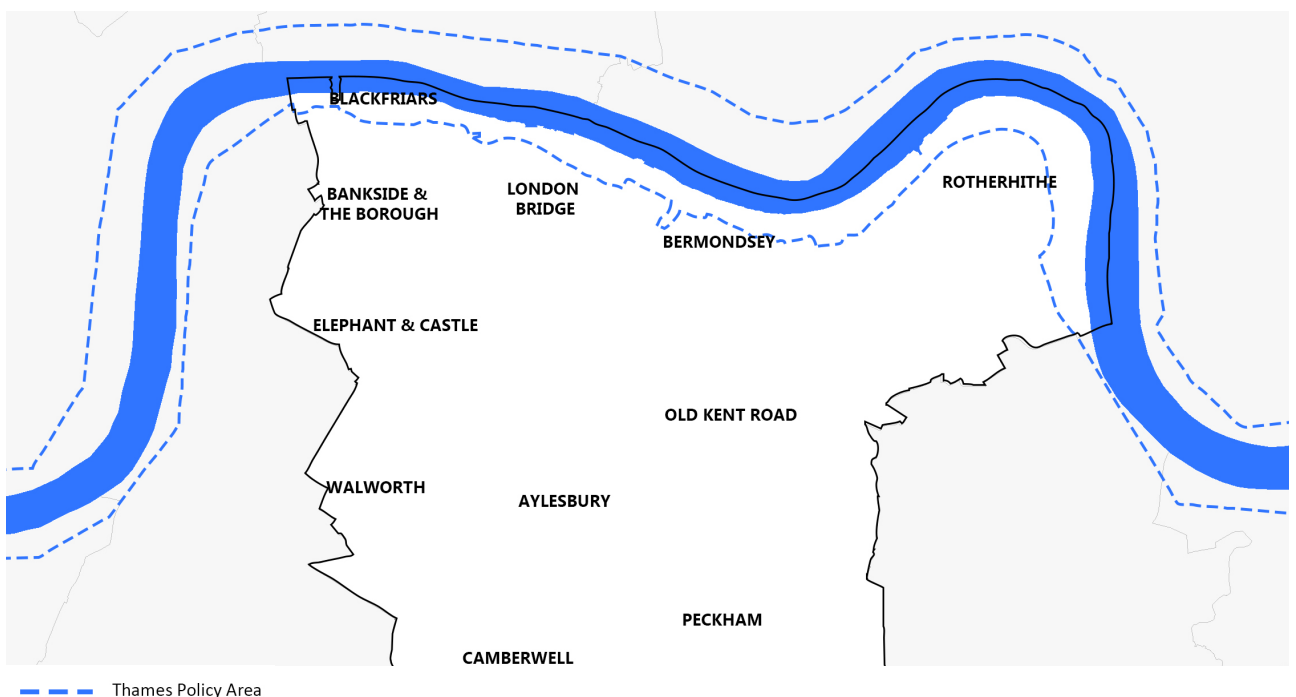
5.6 Thames Policy Area

The Thames Policy Area covers the extent of the riverfront including the Bankside, Borough and London Bridge Opportunity Area and Canada Water Action Area. A tall building within this area is considered above 25m, as opposed to 30m in the rest of the borough.

The strategic importance and unique character of the River Thames needs to be maintained and enhanced to enable the use and enjoyment of the Thames for all. The Thames Policy Area makes an important historical and environmental contribution to Southwark and London enabling significant recreation, tourism, nature conservation and open space provision. This is a busy tourist area which is environmentally sensitive and subject to development pressure.

Intense tall building development could adversely impact the character of the Thames riverfront. New development located within the Thames Policy Area should consider the existing scale and character of development and respond appropriately.

Figure 9: Thames Policy Area



5.7 Historic parks and gardens and open space

Southwark has 215 Open Space designations that cover around 559ha. Of these designations there are five historic parks as identified by Historic England, set out in table 2. There are also several protected open spaces within these designations that cover around 138ha, set out in Table 3.

Developments should consider the impact on historic parks and gardens and open space to ensure the preservation or enhancement of significant natural assets. Further information on open spaces is provided in the Open Space Strategy (NSPL12), the Canada Water AAP SINC's background paper (NSPL15) and the Peckham and Nunhead AAP SINC's background paper (NSPL14).

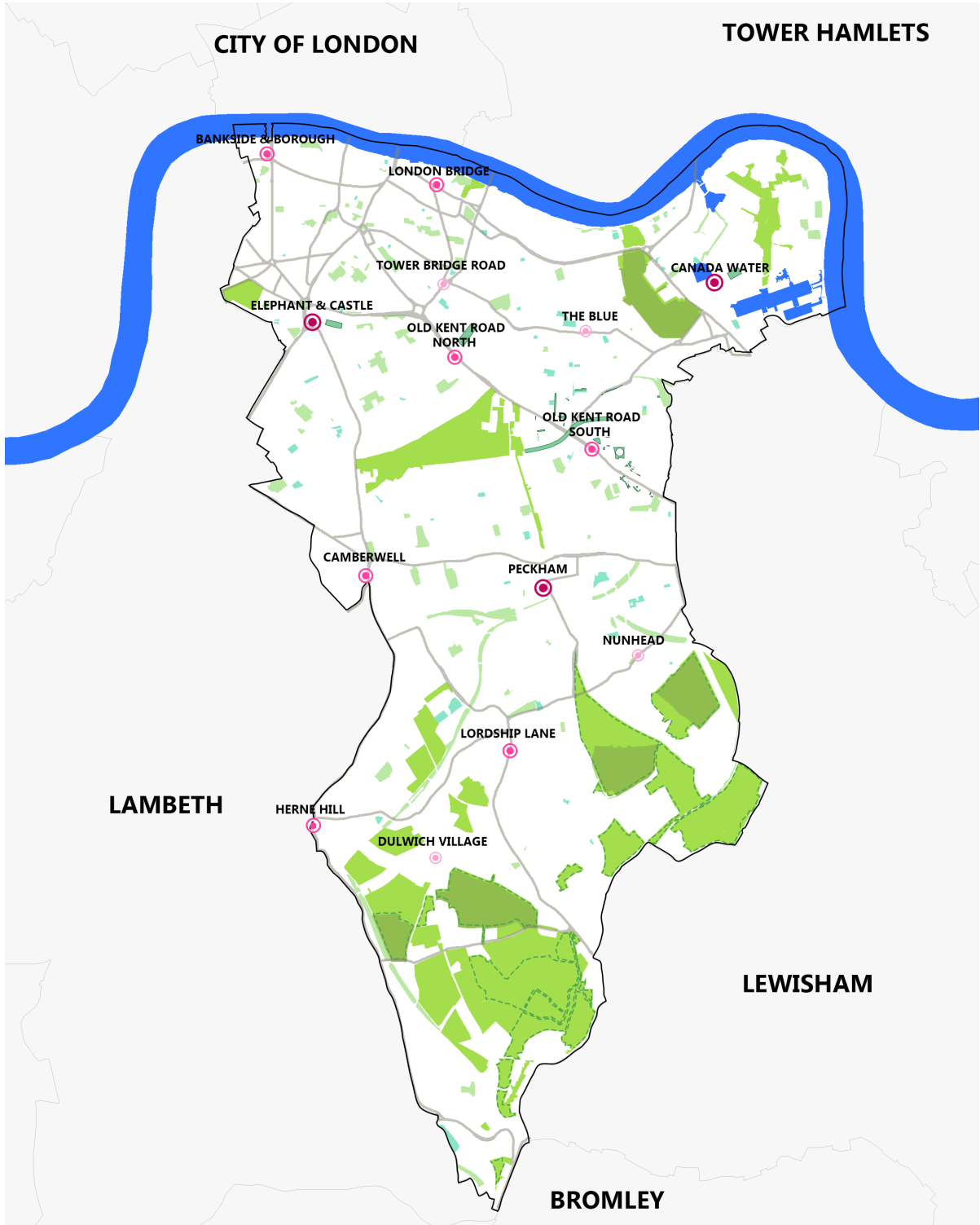
Table 2 shows the designated historic parks in the borough









Site ID	Name of historic parks	Size (ha)
OS53	Southwark Park	26.57
OS124	Peckham Rye Park and Common and Piermont Green	42.75
OS126	Nunhead Cemetery	20.37
OS159	Dulwich Park	30.85
OS160	Belair Park(Dulwich)	10.60

Table 3 shows the protected open spaces in the borough

Site ID	Name of protected open spaces	Size (ha)
OS56	Geraldine Mary Harmsworth Park	5.94
OS68	Victory Community Park	0.51
OS70	Salisbury Row Park	1.14
OS76	Nursery Row Park	1.45
OS124	Peckham Rye Park and Common and Piermont	42.75
OS125	Nunhead Reservoir	3.87
OS126	Nunhead Cemetery	20.37
OS127	Ivydale Road Playing Field	6.20
OS132	Water Works	0.25
OS133	Nunhead Allotments	3.46
OS137	Waverley School	1.46
OS142	Homestall Road Playing Field	1.73
OS143	Aquarius Golf Course	13.31
OS144	Brenchley Gardens	3.17
OS145	Camberwell New Cemetery and Grounds	17.72
OS150	One Tree Hill	6.95
OS151	Honor Oak Allotments	2.21
OS152	Honor Oak Sports Ground	5.06

Figure 11: Historic parks and gardens, and protected open spaces



- | | | | |
|--|--|---|--|
|  Metropolitan Open Land |  Borough Open Land |  Other Open Space |  Local Nature Reserve |
|  Open Water Space |  Registered Parks and Gardens |  Proposed Open Space |  Green Chain Links |

6 Design Quality

This section emphasises the importance of good design in tall building developments and the relevant policy and guidance which has informed Southwark's understanding of what this means.

6.1 Importance of good design

The National Planning Policy Framework makes clear that creating high quality buildings and places is fundamental to what the planning and development process should achieve. The National Planning Policy Framework expands upon the fundamental principles of good design to define what is expected for well-designed places and explain how planning policies and decisions should support this. When determining applications the NPPF advises attributing great weight to outstanding or innovative designs which promote high levels of sustainability, or which raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

Poor design and a lack of consideration of local and historic context can lead to new developments having a negative impact on their surroundings. In particular to tall buildings, schemes of substandard design quality can appear overly dominant on an area and out of character. Design needs to take account of the needs of existing and new residents to ensure developments are fit for purpose and respond to the local context appropriately.

Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development.

6.2 Characteristics of good design

In order to ensure poorly designed schemes are not approved, Southwark aims to follow the National Design Guide (NSPN2), published by MHCLG to determine plan-led design approaches that define a high standard of architectural design quality.

This design guide, the National Design Guide, illustrates how well-designed places can be achieved in practice. It forms part of the Government's collection of planning practice guidance and should be read alongside the separate planning practice guidance on design process and tools.

The National Design guide introduces ten characteristics that can be seen in figure 12. The characteristics are underpinned by three themes: Character; Community; and Climate, which aligns with the NPPF.

The characteristics can be interpreted into plan-led design approaches identified as:

6.2.1 Townscape and/or heritage-led design

This includes highlighting the value of heritage, local history and culture in an area and demonstrating an understanding of a site's local and wider context by responding to the existing local character.

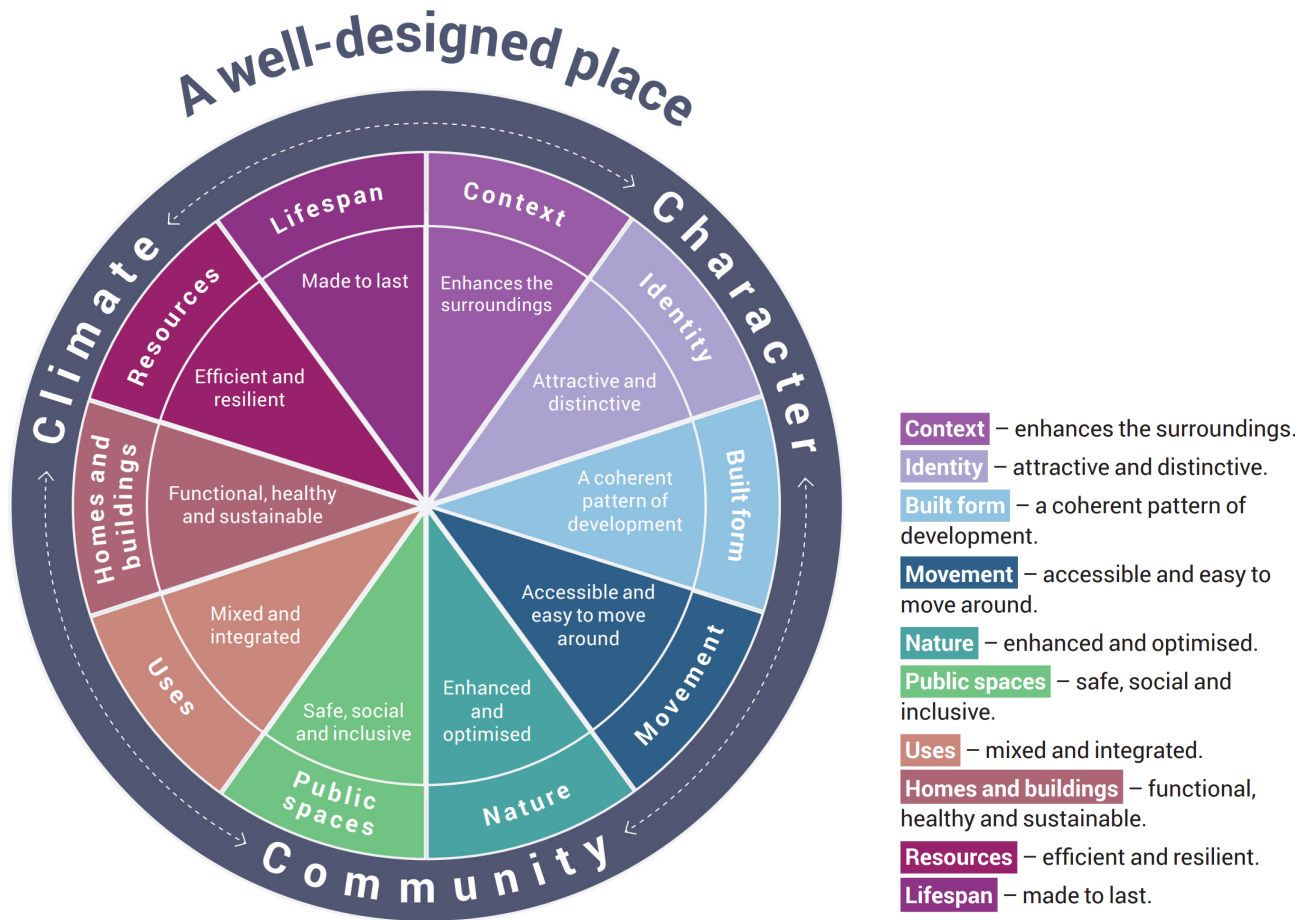
6.2.2 Environmentally sustainable design

This includes providing well-designed places that take account of local environmental conditions to create energy efficient buildings that provide green infrastructure to support the buildings use.

6.2.3 Socially sustainable design

This includes providing well located, high quality, attractive, healthy, safe and comfortable internal and external environments that encourage social interaction.

Figure 12: MHCLG National Design Guide's ten characteristics of good design



Case Study: Blackfriars Circus

This development forms a townscape landmark to the Blackfriars Road area whilst limiting harm to the wider St. George's Circus conservation area.

The hexagonal form building creates slender facades with vertical emphasis. The use of brick cladding gives it a character that fits well into its historic surroundings, and a texture that is human scale and tactile where the building meets the ground.

Address: 142 Blackfriars Rd, SE1 8EQ
 Completed: 2017
 Usage: Residential led, mixed-use scheme
 Height: 5-27 storeys
 Consented: 2014
 Image: Maccreeanor Lavington



7 Tall Building Strategy

This section sets out Southwark's tall building strategy which has been informed by the preceding chapters and taken into account the relevant planning policy, guidance, design considerations and constraints which have been discussed.

The tall building strategy consists of the following documents, an overview of which is presented in the rest of this section;

- New Southwark Plan Strategic Policy SP2 Regeneration that works for all
- New Southwark Plan Development Management Policy P16: Tall Buildings
- New Southwark Plan Area Visions AV.01, AV.02, AV.04, AV.09, AV.11, AV.13, AV.14, AV.15
- Elephant and Castle Supplementary Planning Document and Opportunity Area Planning Framework (OAPF) (2012)
- Canada Water Area Action Plan (2015)
- Blackfriars Road Supplementary Planning Document 2014 (NSPL7)
- Old Kent Road Action Plan Emerging (2020)
- Peckham and Nunhead Area Action Plan (2014)
- Aylesbury Area Action Plan (2010)
- Characterisation studies

7.1 Strategic Policy

Strategic policies are borough-wide policies which set out the council's regeneration strategy to work with local people to improve neighbourhoods and create new opportunities for the future. They are also used to set the context for our detailed planning policies and to make planning decisions.

7.1.1 SP2 Regeneration that works for all, New Southwark Plan 2019

We will continue to revitalise our places and neighbourhoods to create new opportunities for residents and local businesses, to promote wellbeing and reduce inequalities so that people have better lives in stronger communities.

This will be achieved through:

- Developing places where everyone can benefit from all activities, including play spaces, leisure activities, squares and shops, buildings and the natural environment. These places should enable everyone to feel proud of their home and create a sense of belonging in the community; and
- Investing in our communities and residents, and particularly existing residents, so that everyone can access the benefits of our regeneration programmes and the opportunities created by those programmes for new homes, new jobs, education, training and new infrastructure; and
- Encouraging greater tenure integration and equality within and between new development in order to create the conditions for properly mixed and integrated communities, ensuring equity of esteem from street level, and to mitigate against stark visible differences and a sense of tenure segregation; and
- Ensuring that buildings have a positive relationship with the public realm and the existing place, providing opportunities for new street trees, and designing lower floors to directly relate to the street, with an appropriate transition in scale to create a positive pedestrian experience and developments that link with the existing communities;
- Developments being designed for diverse communities in Southwark and to ensure accessibility, inclusivity, and interaction, regardless of disability, age or gender, and allow all to participate equally, confidently and independently in everyday activities.
- Making our neighbourhoods safer with well-designed buildings and spaces that discourage crime and anti-social behaviour and foster a sense of community; and
- Encouraging residential development above shops to enliven town centres; and

- Ensuring that our existing residents and neighbourhoods prosper from good growth by giving people from every community the opportunity to collaborate throughout the regeneration process; and
- Enhancing local distinctiveness and heritage-led regeneration by requiring the highest possible standards of design, creating vibrant, attractive, healthy, safe and distinctive buildings and places that instill pride of place in all our communities. This will include networks of green infrastructure, opportunities for healthy activities and improving streets, squares and public places between buildings; and
- Strengthening support in regeneration areas for those who are vulnerable or who face greater disadvantage, by investing in the prevention and tackling causes of inequality, involving all of our services, partners and community-based activities.

7.2 Development Management Policy P16: Tall Buildings

Development management policies set out further detail which is required to deliver the strategic policies. They are used to assess planning applications. Policy P16 of the New Southwark Plan is concerned with tall building developments.

7.2.1 Appropriate areas for Tall buildings

P16.1 Tall Buildings is as follows;

Areas where we expect tall buildings are in figure 4. These are typically within our Major Town Centres, Opportunity Area Cores, Action Area Cores and the Central Activities Zone (CAZ). Individual sites where taller buildings may be possible have been identified in the site allocations. Some of these site allocations have identified possible sites for tall buildings in Peckham and Camberwell town centres taking account of conservation areas and other heritage assets.

These identified areas meet the considerations set out in policy 7.7 of the London Plan (NSPR1), policy D9 of the draft New London Plan (NSPR2) and the guidance in the Historic England Advice Note 4 2020 (NSPN3).

7.2.2 Townscape Requirements

Policy P16.2 of the New Southwark Plan sets out what we expect tall buildings to deliver.

1. *Be located at a point of landmark significance; and*
2. *Have a height that is proportionate to the significance of the proposed location and the size of the site; and*
3. *Make a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings; and*
4. *Not cause a harmful impact on strategic views, as set out in the London View Management Framework, or to our Borough views; and*
5. *Respond positively to local character and townscape; and*
6. *Provide a functional public space that is appropriate to the height and size of the proposed building; and*
7. *Provide a new publicly accessible space at or near to the top of the building and communal facilities for users and residents where appropriate.*

These identified areas meet the considerations set out in policy 7.7 of the London Plan (NSPR1), policy D9 of the draft New London Plan (NSPR2).

7.2.3 Architectural Design

P16.3 sets out the design requirements for tall buildings as followed; .

1. *Be of exemplary architectural design and residential quality; and*
2. *Conserve or enhance the significance of designated heritage assets and make a positive contribution to wider townscape character. Where proposals will affect the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) clear and convincing justification in the form of public benefits will be required; and*
3. *Avoid harmful and uncomfortable environmental impacts including wind shear, overshadowing, and solar glare; and*
4. *Maximise energy efficiency and prioritise the use of sustainable materials; and*
5. *Have a positive relationship with the public realm, provide opportunities for new street trees, and design lower floors to successfully relate to and create a positive pedestrian experience; and provide widened footways and routes to accommodate increased footfall.*

These design requirements meet the considerations set out in policy 7.7 of the London Plan (NSPR1), policy D9 of the draft New London Plan (NSPR2), MHCLG National Design Guide (NSPN2) and the guidance in the Historic England Advice Note 4 2020 (NSPN3).

7.3 Area Strategies

Area Visions in the New Southwark Plan provide the strategic vision for the future of Southwark's distinct places and neighbourhoods. They set out infrastructure improvements, opportunities for improved public spaces, transport improvements and growth opportunities for new homes and jobs. Area Visions also identify the character of different places to be renewed, retained or enhanced. Development proposals should be prepared in the context of the relevant Area Vision and should demonstrate how they contribute towards the strategic vision for that area.

New tall buildings are expected to make a positive contribution to regenerating areas, ensuring that development is sustainable. The height and scale of development is an important consideration within our vision to create attractive, distinctive and unique places. By setting high environmental and design standards ensures that development preserves or enhances the significance of the historic environment, heritage assets and their settings, along with protecting and improving heritage and a network of open space throughout the borough.

Through the site visions and site allocations section of the New Southwark plan we have established that tall building development would be most suitable in the location providing one or more of the following

- Within the Central Activity Zone and action area cores where we would expect high density development. This is explored further in section 5.
- Proximity to major transport hubs which could cater for a potential increased demand on the transport network due to intense development in the area.
- A location that can emphasise point of civic or visual significance, such as at a gateway, major thoroughfare or junction of major thoroughfares and in town centres.
- An area where there are opportunities for tall buildings can contribute to enhancing the public realm or the improving the permeability of the area.
- Focus for regeneration and activity which would suit new large scale intense development.

We will consider whether tall buildings are appropriate in other parts of the borough by carrying out urban design analysis to consider the constraints for tall buildings and taking account of conservation areas and other heritage assets.

Detailed strategies on building heights, design quality and constraints can be found in the corresponding Area Action Plan or Supplementary Planning Document and are broadly summarised in the rest of the section.

7.3.1 Elephant and Castle Major Town Centre

Elephant and Castle is undergoing a major transformation with significant investments in housing, retail, transport interchange hubs and public realm.

Elephant and Castle Supplementary Planning Document and Opportunity Area Planning Framework (OAPF) (2012)

The document provides a framework that will guide development over the next 15 years, ensuring that regeneration is coordinated and sustainable

SPD 17 Building heights

- Tall buildings in the opportunity area will help signal its regeneration.
- The tallest buildings should act as focal points in views towards the Elephant and Castle along main roads and strengthen gateways into the central area.
- Moving away from the tallest points, they should diminish in height to manage the transition down to the existing context. They should be used to add interest to London's skyline and when viewed in a cluster, should be articulated to ensure that they do not form a single mass.
- A real advantage of building high is that it enables more public realm at ground level to be provided. The base of tall buildings should be permeable and they should not appear as extrusions from podia.

AV.09 Elephant and Castle Area Vision, New Southwark Plan 2019

- Support the area's function as a major town centre for all Southwark residents and a central London location that attracts global business, research, teaching, shopping, flexible business spaces and cultural activities
- Support the creation of a distinctive environment through a mix of innovative and enduring new architecture, heritage buildings, open spaces and quality public realm that provides greenery, safety, connectivity and reduces exposure to air pollution;

7.3.2 Canada Water Opportunity Area

Canada Water was identified by the Greater London Authority in the 2015 London Plan as an opportunity area, suitable for accommodating large scale development. The transport connections in the area will be improved to offer good public transport accessibility.

Canada Water Area Action Plan (2015)

The Canada Water Area Action Plan (2015) is a plan to regenerate the area around Canada Water. It sets out a vision for how the area will change over the period leading up to 2026.

Policy 17 Building heights

- Tall buildings will be appropriate in important locations in the town centre, where they reinforce the character and function of the centre and help make the centre easy to understand and move around. In particular, they will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point within the town centre
- Buildings which are significantly higher than 25 storeys must demonstrate that they contribute positively to London's skyline, when viewed locally and in more distant views and that they make exceptional contributions to the regeneration of the area.
- There is also the potential for tall buildings (of 30m and above - roughly 10 storeys) in the town centre. Designed well and in the right locations, they will support our aim of regenerating the town centre.
- The basin and public spaces around it have the potential to be the focal point of the town centre and should also be the focal point for the tallest elements of development.

- There is a need to ensure that the relationship between tall buildings is considered to ensure they do not merge to form a wall of development. Individual buildings should be distinguishable and contribute positively to the local skyline.
- Tall buildings at Canada Water are visible in views along the river, including views from London and Tower Bridge.
- Buildings which are significantly taller than 25 storeys (the height of Ontario Point) will have a correspondingly greater impact on London's skyline.

AV.15 Rotherhithe Area Vision, New Southwark Plan 2019

- Create a new destination around the Canada Water basin which combines shopping, civic, education, and leisure, business and residential uses.
- Provide as many homes as possible of a range of tenures including social housing while respecting the local character.
- There will be opportunities for taller buildings on key development sites.

7.3.3 Aylesbury Action Area Core

This area is mostly selected for the re-development of the Aylesbury Estate which aims to provide housing, retail, community places, workspaces, green spaces and improved transport. Development in this area has potential for a new landmark to become a point of significance to the Aylesbury regeneration area, and to mark main access points for wayfinding in the borough.

Aylesbury Area Action Plan (2010)

The Aylesbury Area Action Plan (2010) contains a vision for the area, policies for its development, and a delivery plan for future investment. Policy 4.4 Building heights:

- Most of the new development should have a general height of between 2 and 4 storeys.
- Buildings which are taller than the general height should be situated in important locations
- Height and scale should respect the setting of the conservation areas and preserve or enhance their character and appearance.
- The general height in Thurlow Street and Albany Road will be greater, mostly between 7 to 10 storeys. The larger general height in Thurlow Street will mark its importance as the main local street for the new neighbourhood.
- The buildings located at the junction of Thurlow Street and Albany Road will signal the regeneration of the area. It will have an exemplary standard of design, help to raise the profile of the AAP area and attract investment. The taller buildings will be close to good public transport routes.

AV.01 Aylesbury Area Vision, New Southwark Plan 2019

- Generate new neighbourhoods with a range of housing tenures and sizes that will attract existing residents to stay and new people to move in, including Southwark residents who want to stay and benefit from the great connections, facilities and communities
- Deliver excellent design that expresses timeless quality and variety, contributing to the sense of different districts and to the health and wellbeing of communities across the development area;

7.3.4 Bankside, Borough and London Bridge (CAZ) & Blackfriars Road (CAZ)

The Central Activities Zone has the potential for development intensification, due to the improvements to public transport and interchange facilities at London Bridge Station. There has further been improved pedestrian integration with the surrounding area.

Blackfriars Road Supplementary Planning Document 2014 (NSPL7)

This document will provide a strategic framework and detailed guidance to coordinate future growth along and around the Blackfriars Road.

SPD 5 Building heights

- The heights will be taller along the main routes, with appropriate heights of up to 30 metres, depending on the local context. Heights off of the main routes will generally be lower.
- Tall buildings will be encouraged in important locations, where they reinforce the character and function of this main route into central London. These landmarks will highlight the importance of Blackfriars Road as a gateway to Southwark and create new focal points at main transport junctions along Blackfriars Road to Elephant and Castle.
- Buildings which are significantly higher than 50 metres must demonstrate that they contribute positively to London's skyline, when viewed locally and in more distant views, particularly on the river front and that they make exceptional contribution to the regeneration of the area.
- To create an appropriate setting for tall buildings, the amount of public space at the base of the building should relate to its height, ensuring that the space around the base of tall buildings does not appear cramped or unwelcoming.
- As they will comprise "vertical communities", communal facilities should be provided for residents, such as viewing platforms, winter gardens and flexible meeting spaces. Tall buildings should increase housing choice by providing a range of apartment types.

AV.04 Blackfriars Road Area Vision, New Southwark Plan 2019

- Provide new employment floorspace to meet a range of commercial needs including new offices and workspaces, hotels and shops
- Provide new workspace, particularly flexible business space, cultural, leisure, arts, entertainment and community facilities
- Protect and positively respond to the character and historic value of the surrounding residential areas
- Improve the look and feel of streets and public spaces, creating a strong identity for Blackfriars Road that is welcoming and memorable, and which sustains and enhances the historic environment.
- There will be a range of building heights along Blackfriars Road, with the tallest buildings clustered at the north end of the road, signifying its position in central London and a gateway to Southwark.
- There will also be taller buildings at the important locations of Southwark tube station and at the southern end of Blackfriars Road towards St George's Circus;

AV.11 London Bridge Area Vision, New Southwark Plan 2019

- Support the creation of a distinctive and inspiring world class environment through a mix of inspiring new architecture, restored and reactivated warehouses and other heritage revealed with 'placemarks'
- Make sure the new standard of London Bridge Station is upheld and the Shard remains significantly taller and more visible than surrounding buildings as the station's landmark
- London Bridge is part of central London and has the potential to grow its strategic office provision, shops leisure, culture, science and medical facilities. London Bridge will also contribute towards meeting the borough's housing needs.

7.3.5 Old Kent Road Opportunity Area

The Old Kent Road regeneration area was also identified by the Greater London Authority as an area of opportunity for residential-led development. It was found to be capable of managing an increased capacity of residents, making the area an appropriate consideration for tall building development.

Old Kent Road Action Plan Emerging (2020)

The purpose of the Old Kent Road Area Action Plan (AAP) is to set out how the best of the Old Kent Road, including its thriving businesses and arts and cultural communities, can be nurtured and developed over the next 20 years. The AAP is due to be submitted in early 2020 and adopted in November 2021.

AAP 8 Tall building strategy – The Stations and the Crossings

- Implement the ‘Stations and Crossings’ strategy for the distribution of tall buildings which will reinforce the proposed hierarchy of buildings, places and streets and define a clear pattern of development that will ensure a coherent, legible and well articulated townscape and skyline.
- The tallest, ‘Tier One’ tall buildings (over 30 storeys) will mark the locations of greatest, city wide importance. They will be located at:
 - The new BLE stations, to mark their city wide significance and optimise the use of land in the most accessible locations; and
 - The principle crossings in the city structure, where the main roads from Peckham to Canada Water and from Walworth to Bermondsey cross the Old Kent Road; and
 - The point where the new Surrey Canal Park crosses Old Kent Road and adjacent to the largest new open spaces, like that proposed in the Ruby Triangle.
- Mid height, ‘Tier Two’ tall buildings (between 16 and 25 storeys) will mark places of local importance to help define their character and assist navigation. They will be located at:
 - Key junctions and larger open spaces along the Surrey Canal Park; and
 - Other locally important crossings and junctions on the Old Kent Road; and
 - At the borough boundary between Ilderton Road and New Bermondsey and close to the Old Kent Road.
- ‘Tier Three’ tall buildings (up to 16 storeys) will act as markers within the street scene. At appropriate corners and junctions, or in relation to important land uses, they will emerge from the lower buildings that enclose the streets and open spaces. They will be located at:
 - Mandela Way Park, to offer commensurate enclosure to this generous open space without breaching protected views; and
 - The south side of the Surrey Canal Park to offer definition to the open space without causing harmful overshadowing.
- In addition, the distribution of all three tiers of tall buildings will be considered together to ensure that the overall tall buildings composition makes a positive contribution to the London skyline. In general, tall buildings will be avoided around the edges of the masterplan, where new development will meet existing, lower height housing.
- We will require the submission of 3D digital models with planning applications to better understand the impact of proposals.

AV.13 Old Kent Road Area Vision, New Southwark Plan 2019

- Help grow the significant economic base in the Old Kent Road, not just for offices, but over a wide range of skills and job types, including the types of business that service Central London such as the distribution industry and new and growing sectors such as the arts industry.
- This includes promoting innovative ways of mixing homes with commercial uses and making the best use of space which, done with care, will deliver a place that is desirable to live and work in;
- Build new homes that come in a range of types from terraced houses to apartments with a high design quality including generous room sizes, high ceilings and big windows to ensure people have space to think and to rest.

7.3.6 Peckham and Nunhead Action Area Core

The Peckham core action area is identified as the main focus for development and activity. The core action area could benefit from improvements to attract people to these locations and encourage more activity, balanced with the objective to protect the heritage, particularly the newly designated conservation areas around Rye Lane and Peckham Hill Street.

Peckham and Nunhead Area Action Plan (2014)

The Peckham and Nunhead Area Action Plan will help bring long-lasting improvements to Peckham and Nunhead. It sets out policies to guide development over the next 10 years.

Policy 26 Building heights

- Within Peckham core action area there is the potential for some taller landmark buildings to help regenerate and mark the significance of Peckham.
- The scale of development will match existing buildings except in Peckham core action area where there could be some taller buildings and more intense development on five sites.
 - Copeland Industrial Park & 1 - 27 Bournemouth Road (site PNAAP 4) up to 15 storeys
 - Former Wooddene estate (site PNAAP 5) up to 15 storeys
 - Copeland Road car park (site PNAAP 7) up to 8 storeys
 - Aylesham Centre (site PNAAP 1) up to 20 storeys
- It should sustain and enhance the significance of Peckham's heritage assets, their settings and the wider historic environment, including conservation areas and listed and locally listed buildings, having regard to both individual and cumulative impacts on the surrounding area.
- On the sites listed above, the taller element should be linked to an improved and generous public realm. It should be designed to improve local legibility, to act as a local landmark within a public space of its own and as a focus on routes across the site.

7.4 Characterisation studies

We have also undertaken characterisation studies (NSPL16 to NSPL20) which seek to establish and evaluate the current character of areas undergoing regeneration.

They help to set out opportunities to preserve and enhance the unique character of Southwark's neighbourhoods.

- Bankside, Borough and London Bridge (2013)
- Old Kent Road (2016)
- Peckham and Nunhead (2012)
- Elephant and Castle Opportunity Area Characterisation Study (2011)

7.5 Other urban analysis

Supporting these documents is a series of studies, presented as background/research papers and evidence base to rationalise our approach to the regeneration of these areas.

- Aylesbury AAP (NSPL3) provides a supporting Visual impact assessment (NSPL24) looking at existing heights in the surrounding area and concluding with a visual assessment of impacts from the proposed building heights on strategic and sensitive local views.
- The Old Kent Road place making study (NSPL23) alongside the forthcoming Old Kent Road AAPs Tall building study (NSPL25) sets out the potential of the area and the surrounding area, with both documents supporting the Old Kent Road AAP (NSPL6)
- Urban design studies (NSPL26 to NSPL39) have been prepared to ensure that tall building development contributes effectively to the urban grain through the development of the public realm.



Figure 13: VU.CITY model (Image: VU.CITY)

7.6 3D modelling

Southwark are using VU.CITY to enable a greater understanding of developers' proposals in context. Using a 3D model of the whole borough, it is possible to overlay GIS data, sightlines, LVMFs, transport links and sunlight paths. 3D modelling provides the opportunity to assess development and infrastructure projects both in the context of the borough, but also in the wider context of London.

Major (upto 50 units or 50,000 sq ft) and Strategic Major Application schemes (more than 50 units or 50,000 sq ft) will be required to provide a 3D electronic model in an appropriate format so that it can be incorporated into the VU.CITY model.

8 Conclusion

Tall buildings, if thoughtfully designed to an exemplary standard, can be an important component in contributing to Southwark's physical regeneration, raising population density, avoiding urban sprawl and increasing the activities and life opportunities on offer for nearby residents. However, tall buildings can look out of place in their surroundings, harm the setting of historic buildings and cause unpleasant environmental effects, especially on the location's microclimate. Detailed modelling and analysis will be required to assess these impacts.

The findings established in this tall buildings background paper have contributed towards the process of defining our tall buildings strategy and underpins the New Southwark Plan policy P16: Tall buildings. The New Southwark Plan has been informed by national and regional planning policy and guidance and builds on existing Area Action Plans and Supplementary Planning Documents. This background paper has shown how Southwark's tall building strategy has evolved through an exploration of policy context and area specific guidance and has proven it has given due consideration to local context.

The evidence collated from the policy context and analysis of opportunities and constraints demonstrated that tall building developments would be most appropriate in areas characterised as;

- Located within the Central Activity Zone, Opportunity Areas or Action Area Cores and where we would expect high density development.
- Located within an area which is a focus for regeneration and can provide large scale intense development
- Located close to a major transport node with capacity to take the increased pressure and additional users created from the new development
- Capable of making a major contribution to enhancing the public realm or improving the permeability of the area.
- Able to emphasise a point of civic or visual significance
- Able to complement and enhance the local context and surroundings of the area and not prove overbearing on the skyline
- Not in locations where tall building development would be out of context with local character.

Developments are further expected to;

- Create better integration with the surrounding context by relating to existing urban grain, scale of buildings and density of development;
- Provide more legible arrangements of the public realm, taking advantage of the space that is freed up by tall building developments
- Avoid adversely affecting strategic views, borough local views, the Thames Policy Area, the setting and views of World Heritage Sites and heritage assets, historic parks and gardens and protected open space.

APPENDIX A REFERENCE LIST

Reference List

National

- NSPN1. National Planning Policy Framework, MHCLG, March 2012 (Revised July 2018)
- NSPN2. National Design Guide, MHCLG, October 2019
- NSPN3. Tall Buildings: Historic England Advice Note 4, Historic England, December 2015
- NSPN4. Understanding Place: Historic Area Assessments, Historic England, April 2017

Regional

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- NSPR3. London View Management Framework Supplementary Planning Guidance, GLA, March 2012
- NSPR4. Mayor's Transport Strategy, GLA, March 2018

Local

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- NSPL4. Canada Water Area Action Plan, Southwark Council, November 2015
- NSPL5. Peckham & Nunhead Area Action Plan, Southwark Council, November 2014
- NSPL6. Draft Old Kent Road Area Action Plan, Southwark Council
- NSPL7. Blackfriars Road Supplementary Planning Document, Southwark Council, January 2014
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- NSPL20. Old Kent Road Characterisation Study, Allies and Morrison, November 2015
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- NSPL22. Canada Water AAP Public realm improvements study, The Landscape Partnership, September 2009
- NSPL23. Old Kent Road place making study, Allies and Morrison, May 2016
- NSPL24. Visual impact assessment background paper, Aylesbury Area Action Plan, Southwark Council, May 2009
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- NSPL26. Canada Water AAP Urban design study, Southwark Council, November 2013
- NSPL27. Peckham and Nunhead AAP Urban design study, Southwark Council, September 2012
- NSPL27.1. Peckham and Nunhead AAP Urban design study Update, Southwark Council, 2013

- NSPL28. Peckham and Nunhead AAP Urban design background paper, Southwark Council, March 2013
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- NSPL30. Elephant and Castle SPD Urban design background paper, Southwark Council, March 2012
- NSPL31. Cantium Retail Park Feasibility Study, Old Kent Road Urban Design Studies, Patel Taylor, March 2018
- NSPL32. Cantium Retail Park Local Development Study, Old Kent Road Urban Design Studies, Southwark Council, March 2017
- NSPL33. Livesey Park Local Development Study, Old Kent Road Urban Design Studies, Patel Taylor, October 2018
- NSPL34. Mandela Way and Dunton Road Feasibility Study, Old Kent Road Urban Design Studies, MaccreevorLavington, July 2018
- NSPL35. Old Kent Road South Local Development Study, Old Kent Road Urban Design Studies, Allies and Morrison, November 2016
- NSPL36. Sandgate Street and Verney Road Feasibility Study, Old Kent Road Urban Design Studies, Stitch Architects and Urban Designers, March 2018
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- NSPL38. Six Bridges Industrial Estate Feasibility Study, Old Kent Road Urban Design Studies, Southwark Council, May 2018
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- NSPL50. Aylesbury Housing requirement study, Southwark Council, 2009
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- NSPL52. Borough and Bankside Housing requirement study, Southwark Council, 2009
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- NSPL96. Thorburn Square Conservation Area Appraisal, Southwark Council, January 1991
- NSPL97. Thrale Street Conservation Area Appraisal, Southwark Council, March 1988
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APPENDIX B GLA REPRESENTATION

GLA representation for the New Southwark Plan

Within this section the comments received from the GLA at each stage of consultation alongside our feedback and actions are set out in the table below, demonstrating how the GLA's input has informed the content within the New Southwark Plan: Tall buildings background and research paper, in addition to the New Southwark plan tall buildings policy P16.

Amended Policies consultation: letter dated May 20 2019

Representation	Officer response
<p>P14 Tall Buildings</p> <p>The Mayor welcomes the inclusion of a map which shows where Southwark would expect tall buildings. However, the Mayor believes this map could be further refined to take into account viewing corridors, conservation areas and historic assets and with a more fine grained assessment of specific locations / areas. The policy should also set out some parameters indicating the acceptable building heights in each area.</p>	<p>Representation noted, we welcome the suggestion to update the tall buildings map to provide further clarity.</p>

We derived at our New Southwark Plan tall buildings policy from the above feedback received alongside comments from other statutory stake holders such as Historic England, and non- statutory stakeholders. A summary of how we worked on the policy through partnership set out in Appendix D.

Conformity with the London Plan

Within the New Southwark Plan: Tall buildings background and research paper we have demonstrated our compliance with paragraph A. of the London Plan policy 7.7 which identifies that tall buildings should be a part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations.

We have done this through an analysis and review of considerations, which meets the requirements of paragraph B. of the London Plan policy 7.7. The findings established sets out sites where we anticipate tall building development to be appropriate are reflected in the New Southwark Plan site allocations section, and has also helped to set the policy criteria in the New Southwark Plan tall buildings policy.

Below is the final submission version of the tall buildings policy with corresponding text underlined in grey under each policy point summarising how the policy and background research paper is in general conformity with the London Plan (NSPR1) and the draft New London Plan (NSPR2).

P16 Tall Buildings

1. Areas where we expect tall buildings are on Map 1. These are typically within our Major Town Centres, Opportunity Area Cores, Action Area Cores and the Central Activities Zone. Where detailed guidance can be found in site allocations, the Aylesbury Area Action Plan, Canada Water Area Action Plan, Peckham and Nunhead Area Action Plan, Old Kent Road Area Action Plan and Elephant and Castle SPD this takes precedence over this policy. Some of the individual sites where taller buildings may be possible have been identified in the site allocations. Some of these site allocations have identified possible sites for tall buildings in Peckham and Camberwell town centres taking account of conservation areas and other heritage assets.

Setting out the general locations of where tall buildings shall be located is a requirement of the London Plan, policy 7.7, point a) + b) of paragraph C, but in the draft London Plan, policy D8, point 1) of paragraph B the requirement further expands on this requirement. Through point 1 of our tall buildings policy areas have been identified where there will be specific guidance on tall building development. In addition this, the identified locations and tall building policy is supported with a map, and through out the New Southwark Plan: Tall buildings background and research paper it has been specified that building heights of locations will be detailed in the area based document associated to the site. This demonstrates that all of the requirements for paragraph B of the draft London Plan, policy D8 have been met.

2. Where there is no specific guidance for a site, tall buildings must:

Be located at a points of landmark significance; and

This policy point is in conformity with point b) in the visual impacts section of the New London Plan Policy D8, in addition to the adopted London Plan, policy 7.7, point d) of paragraph C to ensure that there are policy requirements that aid wayfinding from skyline vantage points.

Have a height that is proportionate to the significance of the proposed location and the size of the site; and

The inclusion of this policy point reflects requirements set out within point a) paragraph ii in the visual impacts section of the New London Plan Policy D8, in addition to the adopted London Plan, policy 7.7, point c) of paragraph C. This requirement will ensure that the form or tall buildings fits in appropriately with its site location.

Make a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings; and

The background paper identified that tall buildings can be established as gateways, junctions of major roads and points of civic or local significance which developers should strategically acknowledge in the design of their schemes. Further to this including such a requirement would be compliant with point a) paragraph i in the visual impacts section of the New London Plan Policy D8, and also policy 7.7 of the adopted London plan, point d) of paragraph C.

Not cause a harmful impact on strategic views, as set out in the London View Management Framework, or to our Borough Views; and

Strategic borough views and the established views in the LVMF have been identified as sensitivities that tall building developments should aim to protect where possible. Through protecting such important and sensitive views in the borough this policy point conforms with the London Plan, policy 7.7, point b) of paragraph D. Strategic and borough views have also been protected further through the New Southwark Plan policy P20: Borough Views, as our New Southwark Plan: Tall buildings background and research paper acknowledges these strategically important views within the urban design evaluation section.

Respond positively to local character and townscape; and

In conformity with point c) in the visual impacts section of the New London Plan Policy D8, alongside the London Plan, policy 7.7, point c) + i) of paragraph C, tall buildings must be designed to fit in with their local context, as those that do not will create a negative visual impact. This requirement will also allow for flexibility with design that contributes positively to the borough by retaining and enhancing each townscapes architectural quality.

Provide a new publically accessible space at or near to the top of the building and communal facilities for users and residents where appropriate.

This policy point aims to ensure that tall building development is inclusive for all and benefits all residents

in the borough, in addition to complying with the requirements of the London Plan, policy 7.7, point h) of paragraph C, and paragraph D of the public access section in the draft New London plan's policy D8.

3. The design of Tall buildings will be required to:

Be of exemplary architectural design and residential quality; and

The quality of tall buildings constructed is a crucial policy requirement as tall building development through its lifespan can result in visual and environmental negative impacts if not implemented correctly. To avoid this issue arising we are thoroughly complying with The London Plan, policy 7.7, point a) of paragraph D to ensure regional level requirements are met.

Avoid unacceptable harm to the significance of designated heritage assets or their settings; and
The London Plan, policy 7.7, paragraph E identifies that the impact of tall buildings proposed in sensitive locations should be given particular consideration in relation to these constraints. Point d), e) + f) of the visual impacts section also sets requirements within policy D8. We have identified areas of specific character that could be sensitive to tall buildings in our New Southwark Plan: Tall buildings background and research paper and reflected these in the site allocations section of the New Southwark Plan.

Avoid harmful and uncomfortable environmental impacts including wind shear, overshadowing, and solar glare; and

To avoid harmful environmental impacts as a result of tall buildings this policy point aims to comply with the draft London Plan policy D8, point G of the visual impacts section and the London Plan, policy 7.7, point a) of paragraph D.

Maximise energy efficiency and prioritise the use of sustainable materials; and

The consideration of sustainable materials sets out the aspirations and criteria for considering the design of tall buildings at a sustainable and environmentally friendly level. Including such a requirement conforms to the London Plan, policy 7.7, point e) of paragraph C, the draft London Plan policy D8, point h) of the visual impacts section and the entire environmental impacts section.

Have a positive relationship with the public realm, provide opportunities for new street trees, and design lower floors to successfully relate to and create a positive pedestrian experience; and Provide widened footways and routes to accommodate increased footfall.

The inclusion of this policy requirement shows consideration for development to factor in the enhancement of the qualities of their immediate and wider settings, which also demonstrates conformity with the London Plan, policy 7.7, point f) + g) of paragraph C. In addition to this it sets out consideration to ensure development is making a significant contribution to the surrounding area and streets, which is also compliant with the draft London Plan, policy D8, point a)iii or the visual impacts section.

Fact box

Tall buildings are above 30m except where they are 25m in the Thames Special Policy Area, and also where they are significantly higher than surrounding buildings or their emerging context.

Point of landmark significance: A point of landmark significance is where a number of important routes converge, where there is a concentration of activity and which is or will be the focus of views from several directions.

The addition of a fact box in the New Southwark Plan () policy P14: Tall buildings, has set out the borough wide definition of a tall building which is in conformity with paragraph A of the draft London Plan, policy D8.

Reasons

The London plan requires Development Plans to map the locations where tall building will be an appropriate form of development in principle and to indicate the general building heights that would be appropriate. This should be based on the visual, environmental and cumulative impacts of tall buildings and their potential to contribute to new homes, economic growth and regeneration and their public transport accessibility.

Tall buildings, if thoughtfully designed to an exemplary standard, can be an important component in contributing to Southwark's physical regeneration, raising population density, avoiding urban sprawl and increasing the activities and life opportunities on offer for nearby residents. However, tall buildings can look out of place in their surroundings, harm the setting of historic buildings and cause unpleasant environmental effects, especially on the location's micro-climate. Detailed modelling and analysis will be required to assess these impacts.

Within the reasons section of the New Southwark Plan () policy P14: Tall buildings it was necessary to set out those tall buildings need to be assessed thoroughly factoring all forms of impacts to mitigate against any cumulative impacts. Including this short text in the reasons conforms with policy guidance set out in the draft London Plan policy D8, in the cumulative impacts section.

The tall buildings policy set out above shall be used in all assessments of relevant applications at the development management stage. By ensuring all tall building developments comply with policy P14 of the New Southwark Plan in addition to all DM policies within the NSP we aim to achieve socially, environmentally sustainable tall buildings of exemplar design that are appropriately located. A concise summary of how implementation of the policy is achieved through development management and policies can be seen in Appendix D.

APPENDIX C POLICY BACKGROUND

Policy Background

National

National Planning Policy Framework February 2019

The National Planning Policy Framework (NPPF) puts in place the Government's policies for place making in England. Tall buildings support the Government's commitment to create more sustainable development that significantly boosts the supply of homes in London. The overarching objectives set out in the National Planning Policy Framework (NPPF) alongside policies are not explicitly dedicated to tall buildings, but can be read more generally as design and planning principles guidance which is relevant to the development of tall buildings.

The promotion of high quality design that takes in local context, needs and future opportunities of each area are highlighted as interdependent, but mutually related objectives. The economic, social and environmental objectives are discussed with a detailed explanation of how these objectives shall help achieve sustainable development.

In addition to this, it is set out that Local Planning Authorities should implement planning policies that minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities to provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans) to make high quality places.

Planning policies should also promote the more efficient use of land to deliver a variety of uses with a public realm strategy to meet the needs of groups with specific housing needs and requirements. This can be achieved through higher density, mixed use development and the use of previously developed land alongside the back of buildings, to achieve the housing targets the Government has set. The conservation of local heritage assets and the natural environment is also a priority within the Government's policies, therefore it is imperative that local planning authorities assess the weight of impact on the historic environment from a development and ensures that it secures the future conservation of the historic environment by positively contributing towards it.

Historic England's Tall Buildings: Advice Note 4 2015 and Draft 2020

Historic England's Guidance on Tall Buildings () is regarded as best practice nationally with regard to tall building assessments. It does not constitute policy, but sets out criteria for evaluating tall building proposals and is considered a useful reference in this evidence base. The Government endorses this guidance which is capable of being a material consideration in the determination of planning applications (the letter from the Secretary of State on 1 & 20 Blackfriars Road Public Inquiry demonstrates this).

The Historic England advice note integrates sustainable development and design respectively, and also takes into consideration the historic environment or archaeology are likely to be affected. This guidance provides clarity on the protection of the historic environment when planning for tall buildings. Within the tall buildings advice note local planning authorities are advised to carry out a detailed urban design study as a matter of good practice, in their assessment of suitable and sensitive location for tall buildings.

Section 5 contains detailed criteria for evaluating tall building proposals including relationship to local character, the effect on historic context and world heritage sites and the relationship to transport infrastructure. The Council has developed its own set of criteria's in accordance with Historic England's advice note and the London Plan, for assessing tall building proposals. By combining the characterisation studies with other information on the historic environment the approach can begin to identify suitable locations for major new development and promote designs which are informed by their surroundings.

Regional

London Plan 2016

The London Plan provides the regional policy framework for tall buildings. Within this document the definition of a tall building is defined, with the addition of policy requirements for London Borough's to generally conform with. These policy requirements as set out by the London Plan provide guidance to Local planning authorities to ensure tall and large buildings are part of a plan-led approach. As part of this plan-led approach, local plans should identify appropriate, sensitive and inappropriate locations for tall and large buildings.

Through local plans, planning authorities must give consideration to the impact of a tall building on sensitive locations such as historic and natural environments. Further to this there must be policy requirements that ensure tall building developments does not adversely affect its environment through impacts such as overshadowing.

Tall building developments that are part of a strategic approach; must read aesthetically as a building of high architectural standards and design quality which responds positively to the public realm, and in most cases strategically connects areas through being a point of landmark significance is promoted by London Plan.

Emerging London Plan 2019

As a revision to the adopted London plan, the draft New London Plan has a similar policy in relation to the development of tall and large scale buildings, with the addition of the following requirements:

- Tall building locations and building heights should be located on a map; and
- Local plans must ensure the safety of users through the internal and external design of the building; and
- Developments with economic activity must maximise its potential and benefits to an area to support change; and
- Sets out that mitigation measures must be identified and resolved in relation to cumulative building impacts.

London View Management Framework, The London Plan Supplementary Planning Guidance, Mayor of London, March 2012

The London Plan and draft New London Plan identifies a number of strategic views important to London, which the Mayor requires management of. These views in accordance with London Plan policies are identified in the London View Management Framework SPG and mapped, setting out how they will be protected and how the impacts of new development will be tested.

Mayor's Transport Strategy, 2018

Within the Mayor's Transport Strategy contains policy, guidance and examples that set out the aspirations for London in relation to health and active travel, transport experience and shaping growth in a city. Chapter 5 discusses transport and growth specific to new homes and jobs, setting out the importance of transport infrastructure to the forthcoming developments in London to support the demands of a growing population. The document also acknowledges that through transport, high-density; mixed-use places can be created with aims to unlock growth potential on underdeveloped sites.

APPENDIX D IMPLEMENTATION STRATEGY

Implementation Strategy

Our vision and strategy for Southwark is for new tall buildings to make a positive contribution to regenerating areas, ensuring that social regeneration is as sustainable as possible. The height and scale of development is an important consideration within our vision to create attractive, distinctive and unique places. By setting high environmental and design standards ensures that development preserves or enhances the significance of the historic environment, heritage assets and their settings, along with protecting and improving heritage and a network of open space throughout the borough.

Tall buildings need to be well designed and planned so that they do not cause adverse impacts in terms of microclimate, wind turbulence, overshadowing, block views, noise and reflected glare, but instead aims to incorporate more landscaped public spaces that creates enlivened public places.

To achieve our vision for tall buildings, the main challenges that we need to tackle, and the opportunities that we need to act on in order to achieve our 2019-34 Council Plan vision of a fairer future for all in Southwark are:

- Achieve inclusive, sustainable development by balancing environmental, social and economic needs to ensure a good quality of life for people now and in the long term.
- Continue to develop and strengthen our economy by providing successful town centres, with jobs and places for businesses to thrive, creating an equal and fair opportunity for all.
- Protect historic areas and open spaces. Ensuring open spaces are cared for and accessible to be used by all.
- Improve individual life chances by making sure the design of developments is carefully thought through to contribute successfully to places for people.
- Protect the suburban character of the south of the borough.
- Work in partnership with Lambeth, Lewisham, Tower Hamlets, Bromley, Westminster, City and Croydon to make sure our growth and opportunity areas complement each other.
- Work in partnership with Lambeth, Westminster, the City and Kensington and Chelsea in the Central Activities Zone to improve the north west of Southwark as a part of central London.
- Work in partnership with the GLA, Historic England and CABE to prepare detailed guidance for appropriate tall building developments in planning documents and through the consultation stages of the development management process.

Our implementation strategy to achieve successful tall buildings within our vision is underpinned by the 8 implementation policies with the New Southwark Plan.

1. Implementation through working in partnership

In order to achieve our vision of excellently designed sustainable tall buildings that make a positive contribution to regenerating areas, we will work closely with:

- The local community
- Developers (including Homes & Communities Agency, Registered Social Landlords etc.)
- Commission for Architecture and the Built Environment (CABE)
- Historic England
- Greater London Authority (GLA)
- Southwark Design Review Panel.
- Metropolitan Police
- Business improvement districts (BIDs)
- The voluntary and community sector.

Through the various stages of development to produce a sound, effective and justified local plan, the New Southwark Plan has formally and informally been consulted on 7 times. Below sets out

feedback received from the list above at each stage of consultation and how the feedback received was taken on board to amend the plan in relation to tall building development. We provided officer comments on all the responses we received at each stage of consultation explaining our reasoning for why we have/have not amended the plan to ensure that us working in partnership was entirely transparent.

Pre- Options Version

The first stage of consultation, conducted between October 2013 and February 2014, was called 'Let's talk about your high streets'. This was a very informal initial stage of consultation that took the form of a survey to get people thinking about their high streets and what they want from them. This consultation helped shape area visions and planning policies for the New Southwark Plan Options Document.

We received a total of 516 questionnaire responses. Although none were directly specific to tall buildings, there were general comments that focused on a number of planning related issues that are relevant to tall building development. These included transport, town centre uses, design and heritage, accessibility and the public realm. Comments with a generic application to town centre related planning policy, but are still applicable to tall buildings and were carried through to inform our pre-options version.

Following the pre-options consultation stage we drafted a tall buildings policy which has evolved to the current New Southwark Plan policy P14: Tall buildings. The table below sets out the consideration given to each policy point within P14 and how feedback from consultation has informed the development of the policy.

Options Version

The second stage of consultation was on the New Southwark Plan Options Document (Draft Policies and Area Visions). The Options consultation set out an initial draft of the New Southwark Plan with options on policies where there were different ways that policies could be taken forward to deliver Southwark's strategic development objectives. A full public consultation on this version of the New Southwark Plan was undertaken between 31st October 2014 and 6th March 2015. The Council sought the views of the full range of statutory and non-statutory stakeholders on the draft policies and the key comments raised during consultation regarding the location of tall building development are:

70 out of the 153 comments received related to tall building development. These comments are summarised below:

DM45: Tall and large buildings

Summary of representations	Officer response / policy update action
<p>Should reference the London Views Management Framework. Could also go further by referring to the need for developments, including tall building proposals, to enhance the outstanding universal value of the Tower of London World Heritage Site and its local setting.</p> <p>Could also be more flexible with regard to impact on views, perhaps referencing a requirement for an assessment to be completed that demonstrates that the impacts of the proposed building is acceptable in strategic, borough and local views.</p>	<p>We have added a reference the London Views Management Framework to Policy DM12 (tall buildings).</p> <p>We have amended policy DM19 (world heritage sites) which now refers to sustain and enhance.</p>

Remove requirement for tall buildings to be slender, well-articulated, and recessive as too subjective.	Reference to “slender, well-articulated, and recessive” has been removed, instead the policy refers to “exemplary architectural and residential quality”.
What is the evidence base for the tall building locations (encouraging tall buildings in Peckham town centre was objected to by multiple respondents, however focus on CAZ and Opportunity Areas was broadly supported)? Concerned that other potential locations for tall buildings will be judged on a case-by-case basis. Leaving judgments on where tall buildings go at a strategic level, is contrary to both the EH/CABE Tall Building advice and the NPPF, where a plan-led approach is advocated	The tall buildings policy has been significantly revised, please see policy DM12. It states that the highest buildings will be located in our Regeneration Areas where the highest public transport accessibility levels and densities are located and where there is the greatest opportunity for regeneration.

Preferred option Version - Development Management

Consultation for the New Southwark Plan Preferred Option Part 1: Policies commenced from October 2015 until February 2016. It took into account representations received in response to the Options consultation in order to develop the preferred option for development management policies and regeneration strategy for Southwark. This stage of consultation is more formal to seek the views and any concerns of the full range of statutory and non-statutory stakeholders on the draft policies.

DM12 Tall buildings

Summary of representations	Officer response / policy update action
Location of tall buildings	
Clarifying where tall buildings will be located is important. Locating them in the regeneration areas is flawed as these are not necessarily the right locations as they could destroy the character of those areas rather than enhancing them.	Policy amended in PSV to clarify that tall buildings must be located in areas with the highest levels of public transport access and where there is the greatest opportunity for regeneration.
It should be made clear that tall buildings will not receive consent outside regeneration areas.	Policy wording has been amended in the PSV removing the reference to regeneration areas.
Concern that Burgess Park is highlighted as an area where tall buildings could be sited. This concern is also for Peckham Town Centre as tall building would be completely out of character and scale to the existing townscape.	Burgess Business Park on the south of Burgess Park has been added as a site allocation with specific design guidance including improved links to the park. Further to this tall buildings policy as well guidance in the Peckham area vision and site allocations will be used to assess applications for tall buildings and ensure that local character is enhanced.
Representation opposes to locating tall buildings on all sides of parks as this diminishes natural light creates shadows and impacts on the open aspects and view afforded into and out of a park. It also potentially creates light pollution from the building into the park.	The tall buildings, design and amenity policies will all be applied to ensure that impacts to neighbouring uses, including open space, are acceptable.

<p>With specific regard to Burgess Park we do not wish to see tall buildings along the south boundary of the park (St George's Way/Parkhouse St). The eight story building "Camberwell Fields" on the corner/New Church Road should be the tallest along the western end of the park. Likewise the 10 storey on Trafalgar Avenue is in fact six storeys and then stepped back through the top four storeys, creating a less dominant impression. We propose that these buildings set the maximum height to appropriately frame Burgess Park.</p>	<p>The tall buildings, design and amenity policies will all be applied to ensure that impacts to neighbouring uses, including open space, are acceptable.</p> <p>Burgess Business Park on the south of Burgess Park has been added as a site allocation with specific design guidance including improved links to the park.</p>
<p>The locational criteria for tall buildings should be amended and widened to provide support for tall buildings located at a gateway to an Opportunity Area or at an important point within an identified Opportunity Area.</p>	<p>The policy does not preclude tall buildings in opportunity areas, where they meet the requirements of the policy.</p>
<p>Suggestion that tall buildings should be avoided outside the CAZ, the purpose of which is to cluster tall buildings and this type of investment in to a business district - to start building random tall buildings beyond this will also eventually affect the integrity of the CAZ. London does not need all these overly tall buildings that are for investment and profit and nothing to do with supporting liveable neighbourhoods and local town centres.</p>	<p>Tall buildings can contribute to the physical and social regeneration of Southwark outside of the Central Activities Zone.</p>
<p>Housing requirements</p>	
<p>Propose that this policy be extensively amended to emphasise that planning permissions will not be given to tall buildings, unless they directly meet the requirements of policies DM1 Affordable homes and DM2 New family homes in particular, to discourage expensive exclusive developments which do not meet the needs of Southwark's residents.</p>	<p>Policies will be applied to assess planning applications without need for cross reference.</p>
<p>The increased density of housing in specific neighbourhoods like Peckham need to be accompanied in the NSP with provisions for ensuring that the provision of services is capable of being increased at the same pace as the increase in population. There seems to be no section in the NSP which deals with this.</p>	<p>Health and town centre policies will secure adequate local services across the borough in town centres.</p>
<p>Impact on views</p>	
<p>There should be no new tall buildings in front of the views from the rooftops on the Bussey Building, the Multi Storey building, and the proposed high-line coal line walk. Peckham should have the same protection as Nunhead as a predominantly low rise destination.</p>	<p>Design guidance for the Aylesham Centre and Peckham Bus Station has been amended in the PSV to ensure development considers the view from the Bussey Building rooftop.</p>
<p>Recommendation that the main view points towards Central London from the Multi-Storey Car Park and the Bussey Building should be included as Borough views and so protected by DM17 and DM12 e and DM12f.</p>	<p>These locations do not meet our requirements to be designated borough views as long-term public access is not guaranteed. Design guidance for the Aylesham Centre and Peckham Bus Station has been amended in the PSV to ensure development considers the view from the Bussey Building rooftop.</p>

<p>New Tall buildings adjacent to the river potentially could have a detrimental impact on the views from within the Inner Ward of the Tower of London and also of the Tower from higher ground to the north, looking south. Following the last Reactive Monitoring Mission by UNESCO in 2011, the World Heritage Committee stated very clearly that any further build-up of tall building in the vicinity of the Shard could put the status of the Tower of London WHS at risk. Respondent asks that this is borne in mind in the sitting of any new tall development.</p>	<p>The world heritage site will be given full consideration by applying the world heritage sites policy as well as the tall buildings policy.</p> <p>The tall buildings, design and amenity policies will all be applied to ensure that impacts to neighbouring uses, including open space, are acceptable.</p>
<p>Environmental impacts</p>	
<p>This policy needs to be strengthened as the impacts of shadowing; over-looking, wind sheer and dominance of tall buildings have not been adequately dealt with on the evidence of recent development. An environmental impact studies should be rigorous and transparent, ensuring tall building proposals will not create unacceptable harm and will achieve the minimum level of 'Comfort criteria' for humans at ground level.</p>	<p>A review of our approach to environmental impacts shall be done, with the PSV policy wording amended to require additional information from modelling. The policy has also been amended in the PSV to take account of comfort as well as harm from environmental impacts.</p>
<p>Permission for tall buildings should not be granted when they impact negatively on designated open spaces.</p>	<p>The tall buildings, design and amenity policies will all be applied to ensure that impacts to neighbouring uses, including open space, are acceptable.</p> <p>The policy protects against harmful environmental impacts. The digital infrastructure policy requires applicants for largescale development to engage with digital infrastructure providers</p>
<p>Design guidance</p>	
<p>Point C should cross-reference policies DM9, DM10 and DM11 with regard to design guidance.</p>	<p>Policies will be applied to assess planning applications without need for cross reference.</p>
<p>Sustainable design</p>	
<p>Amend part h of policy to say "Maximise energy efficiency, minimise embodied energy and prioritise the use of sustainable materials"</p>	<p>Part h of policy shall be amended to say "Maximise energy efficiency, minimise embodied energy and prioritise the use of sustainable materials" as the policy requires materials to be sustainable, which would include the minimisation of their embodied energy.</p>
<p>Public realm design</p>	
<p>Point B should make reference to responding positively to the existing street pattern.</p>	<p>The policy can be applied to consider the existing street pattern where this is relevant to local character and the townscape.</p>
<p>Point I should make reference to having a positive relationship with the wider community and also make reference to 'other greening initiatives' as there is an increasing number of innovative ways to green areas, in addition to new street trees.</p>	<p>The requirement to improve the public realm and pedestrian experience would benefit people widely as well as the other benefits sought by the policy. Other greening is required by the green infrastructure policy.</p>

Public rooftop open space	
Point J should be made applicable to all tall building proposals across the borough.	The requirement for public space for buildings over 30m is applicable across the borough.
The blanket requirement to deliver publically accessible space at or near the top of tall buildings measuring over 60m is considered inappropriate and can cause issues with regards to building maintenance and security. Instead, the policy should be revised to encourage the provision of such publically accessible space, but also make clear that development proposals should be considered on their own merits.	The policy will be applied flexibly when assessing planning applications, if it is not possible to provide a public area due to maintenance and security constraints that will be taken into account.
This policy should be reworded to encourage public accessibility in very tall buildings (over 120m) in appropriate central London locations. Accessibility should be focussed on buildings which are principally office or commercial in use where access and security are more easily controlled.	The policy will be applied flexibly when assessing planning applications, if it is not possible to provide a public area due to maintenance and security constraints that will be taken into account.
Heritage assets and evidence base	
Very few people are aware of these policies being set in the New Southwark Plan with regard to tall buildings. Is there any evidence local communities want high-rise buildings?	A range of views have been expressed relating to tall buildings in response to consultation on the New Southwark Plan.
How will “unacceptable harm to significance” be judged, against what evidence base, when the significance and sensitivity of different heritage assets varies?	The council has access to historic environment evidence including building listings, conservation area appraisals, London-wide and national guidance and the historic environment record.
Concerned that the provision of a functional public space and communal space will be actively used to justify (on the grounds of public benefit) the acceptance of tall buildings when considered against the potential harm to the significance of heritage assets. This is further weakened when the harm to heritage assets is qualified by the term ‘unacceptable’, which implies some harm can happen. This is contrary to the wording related to strategic views, where the judgement is absolute, with ‘no harmful impacts’. We would suggest that greater weight is given to the protection and conservation of heritage assets and setting as expressed in their significance.	The policy will be applied to protect the significance of heritage assets. Weight will be given to their significance by decision makers taking into account heritage designations and evidence.
Respondent asks how will “unacceptable harm to significance” be judged, against what evidence base, when the significance and sensitivity of different heritage assets varies?	The council has access to historic environment evidence including building listings, conservation area appraisals, London-wide and national guidance and the historic environment record.

Proposed Submission Version

After the 3 phases of consultation on the New Southwark Plan Preferred Option, the New Southwark Plan: Proposed Submission Version was published online for comment from 25 October 2017 to 24 December 2017. Following on from this the formal consultation period ran from 2 January to 12 February 2018.

This version of the New Southwark plan was a merger of strategic policies, development policies and the site allocations and visions, taking into account consultation comments received from stakeholders.

Amended Policies consultation

The representations received by the Council during consultation of New Southwark Plan: Proposed Submission Version has been taken into account and has influenced the preparation of the New Southwark Plan Proposed Submission Version: Amended policies 2019. This proposed version was consulted on from 15 January 2019 until 17 May 2019.

These amended policies and allocations are being proposed as a result of representations received during the consultation process or to respond to central government legislation or trends recognised by the Council which these new policies seek to address.

P14 Tall Buildings

Summary of representations	Officer response / policy update action
P14 is not sound because it is badly drafted. Paragraph 2.8 is a direct repeat of paragraph 2.5. Paragraph 2.8 should be deleted.	Acknowledgment of the error within the amended policy P14, point 2.8 will be removed.
The amended policy P14 is not justified or positively prepared because it introduces a fundamental policy change about tall buildings with no evidence to support or justify the change.	Policy P14 is supported and justified by the emerging Tall buildings background and research paper. Once completed this paper shall be uploaded on to the Southwark Council website alongside the evidence base page for the New Southwark Plan
The Mayor has stated that development should respond to character and context- Tall buildings and surrounding context.	<p>Site allocations that have been designated to anticipate tall buildings have been strategically assessed through our Sites Methodology Paper. This methodology paper underpins the site vision section to all site allocations which then provides further guidance on the expectations for the site in regards to how development can integrate with the existing context.</p> <p>In addition to this site locations are being updated to clearly set out the sensitive constraints that each developer should pay regard to when developing the site. These sensitivities are reflective of factors that have been evaluated in the tall buildings background and research paper ensuring tall building development is correctly implemented.</p>

<p>Policy 7.7 of the Mayor’s current London Plan (2016) says: “Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations”.</p> <p>Policy D8 of the new Draft London Plan says: “Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate”.</p>	<p>P14 is considered compliant with the Mayor’s adopted London Plan (2016) and the emerging draft New London Plan, as the workings of our plan-led approach is set out in the emerging Tall buildings background and research paper with an urban context evaluation section mapping out constraints within the Borough. The background and research paper also discusses how ‘appropriate, sensitive and in appropriate locations’ have been identified. Further to this specific site allocations have been identified to anticipate tall building development within the guidance section to ensure that there is a clear plan-led approach to constructing tall buildings. The detail of heights however shall not be covered in the NSP as it is a strategic policy document, but rather in the AAP or SPD associated to the area vision of the site allocation.</p>
<p>The new Southwark Plan makes no reference to the impact of tall buildings on protected Open Spaces. The policy should clearly state that tall buildings would be sensitive in areas where they might have a negative impact on the setting and views of public and protected open spaces.</p>	<p>The emerging tall buildings background and research paper evaluating the potential impacts of tall buildings on sensitive areas, also looks at protected Open Space and Historic parks and therefore should be acknowledged in the New Southwark Plans policy P14. Due to this we welcome this addition and shall reflect it as a minor amendment within the policy.</p> <p>Finally it should be acknowledged that this document and its policies must be read as a whole. Site allocations, Policies SP6, P59: Biodiversity & policy P55: Protection of amenity are considered compatible to the point in policy P14, now clarified as point 3.3 that discusses avoiding harmful environmental impacts, as the identified site locations for taller buildings are expected to be fully assessed against all policies in the NSP to ensure negative impacts do not arise as a result of implementation.</p>

<p>The Mayor welcomes the inclusion of a map which shows where Southwark would expect tall buildings. However, the Mayor believes this map could be further refined to take into account viewing corridors, conservation areas and historic assets and with a more fine grained assessment of specific locations / areas.</p> <p>A map giving clarity on ownership, site boundaries, maximum heights and the overall massing that are the outermost acceptable limits, based on sound town planning principles and respecting the advice already accepted by the Southwark Council in the Conservation Area character assessment already undertaken by the Southwark Council.</p> <p>The large area shown on Map 1. will almost certainly lead to a detrimental impact on the skyline as it encourages a scattered approach to tall buildings. This scattering approach to tall buildings will lead to an incoherent skyline, rather than a coherent one. In addition, Map 1. does not take into account London’s strategy views and therefore contradicts policy 2.0 (Not cause a harmful impact on strategic views).</p> <p>With reference to P14 (Tall Buildings), I do not consider the policy to be sound because the ‘tall buildings map’ is too vague to be effective in any meaningful sense. The definition of what amounts to a ‘tall building’ is likewise too vague given the multiform contexts that seem to be considered possible.</p>	<p>The inclusion of a more detailed map has been tested and has demonstrated itself to lack clarity. As a result of this the map shall remain the same with the additional policy wording of P14 setting out the explicit boundaries of where tall building development is anticipated to be located.</p> <p>A detailed proposal map of the New Southwark Plan shall be produced at submission stage with a detailed based map, outlining the fine grain of boundary locations. It should be noted that the purpose of the map illustration is to indicate where we anticipate development, but this would be subject to the developer adhering to all the policies within the NSP as this document and its policies must be read as a whole. Tall building development will be assessed against all policies in the NSP. This ensures that developers pay regard to all possible factors and constraints relevant to the site when developing and that tall building development is correctly implemented.</p>
<p>Impacts on the public realm are not dealt with adequately to safeguard the quality and safety of the public realm, particularly environmental impacts such as wind and shade.</p>	<p>Representation noted. Mitigation against (environmental impacts such as) wind shear is covered in policy P14, now clarified as point 3.3.</p> <p>Point 3.5 of the policy currently addresses the environmental impacts of tall buildings specific to the pressure of people on public spaces, in addition to general environmental impacts. Therefore the suggested amendment to policy P14 shall not be considered.</p>
<p>Tall buildings block out the light for residents already residing in Southwark, who have the right to light. Surrounding Southwark residents need to be compensated under the Right to Light act and also need to be considered for employment with the many developers in the area. They will have a hugely detrimental impact on the wellbeing of the community as they rob everyone of sunlight,</p>	<p>Representation noted. Tall building development will be assessed against all policies in the NSP. With policy P55: Protection of amenity, providing guidance on how to mitigate impacts related to daylight and sunlight. It should be acknowledged that this document and its policies must be read as a whole</p>

<p>We would like to say as a local resident of more than 15 years to the area we are deeply concerned by the radical intervention into the local environment is subject to such poor consultation process with local business and residents.</p> <p>In addition, the consultation has been woefully ineffectual in including participation of the local community and stakeholders in the area</p>	<p>Policies have been through rigorous amendments with the support of input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF & London Plan. It should be acknowledged that Southwark Council's SCI is currently in the process of being updated and improvements to our ways of communicating with residents shall be a key focal point of this.</p>
<p>The definition of tall buildings as significantly higher than surrounding buildings lacks clarity.</p> <p>The amended policy P14 is unsound (not effective) as it doesn't define what a tall building is.</p> <p>The amended policy is unsound because: There is no definition of where tall buildings are appropriate – simply a comment that area action cores are 'typical' – which means that the Council will not be able to stop tall buildings from getting permission even in vulnerable areas</p>	<p>Representation noted. Policy P14 has been updated for further clarity which now includes the addition of a fact box that sets out our definition of tall buildings. All other definitions for the NSP can be found in the supporting document- Appendix: glossary.</p> <p>The above is applicable for the definition of 'exemplary architectural design'. It should be noted that examples are also illustrated in a section of the tall buildings background paper which also discusses how this will be assessed. Due to this being a strategic policy document it is not considered necessary to update the policy to reflect and duplicate this information.</p>
<p>The amended policy appears to require publicly accessible space to be provided on or near to the top of all buildings that are higher than 30m (3.2); however, the wording of the policy is ambiguous. This is not reasonable or practical for buildings that are potentially as low as ten storeys. Irrespective of height, this also has management and security implications which would be unacceptable in TfL housing projects. For security reasons, TfL would also be unlikely to sanction public access to any office building that it develops for its own use.</p> <p>Paragraph 3.1 requires that proposals for new tall buildings must provide a new publically accessible space at or near to the top of the building and communal facilities for users and residents when above a height of 60m. It is not appropriate to require all buildings above 60m to provide publically accessible space at/ near the top of the building. It is unclear how this policy is justified and why it should be required in all cases. We suggest that wording such as "buildings which exceed 60 metres in height should provide a publically accessible area on upper floors where feasible".</p>	<p>Representation noted. Policy P14 has been updated to re-word the previous policy requirements of point 3 to not be only applicable to developments above 30m and 60m, but a standard for all tall building developments.</p>

<p>There is a requirement at Policy P14, 3.3 to “Provide a new publicly accessible space at or near to the top of the building and communal facilities for users and residents when above a height of 60m”. This requirement is likely to be challenging to commit to due to a range of factors including security issues, management and access considerations.</p>	<p>Representation noted. Policy P14 has been updated to re-word the previous policy requirements of point 3 to not be only applicable to developments above 30m and 60m, but a standard for all tall building developments.</p>
<p>Tall buildings also encourage a contradiction with Southwark’s affordable housing policies. Recent viability reports from the GLA show how it is more difficult to achieve policy compliant levels of affordable housing in tall buildings.</p> <p>Viability: The GLA report dated 2018 on Tall Buildings, affordable housing and viability evidences that overall tall buildings are not generating fast track, affordable housing and that there is the potential to design out affordable housing as the additional costs of construction and maintenance reduce the surplus available for delivering affordable housing. There are (one slated for the current B&Q space on OKR) are clearly stating that they are not viable, yet permission was granted.</p> <p>The GLA report dated 2018 on Tall Buildings, affordable housing and viability evidences that overall tall buildings are not generating fast track, affordable housing and that there is the potential to design out affordable housing as the additional costs of construction and maintenance reduce the surplus available for delivering affordable housing.</p>	<p>It should also be acknowledged that this document and its policies must be read as a whole and that tall building development will be assessed against all policies in the NSP. Therefore our approach to all affordable housing with the inclusion of tall buildings is to achieve the requirements set out in P1: Social rented and intermediate housing. This is a requirement of 35% affordable housing that is made up of a minimum 25% Social rented housing and a minimum of 10% Intermediate housing.</p> <p>Housing Policy Viability Update Study 2017 considers the viability requirements of Policy P1. It confirms that the requirement of 35% affordable housing remains a reasonable requirement across all developments in the borough. Some schemes (subject to their benchmark land values) are able to achieve higher amounts of affordable housing (50% affordable housing). It also notes that some typologies tested were unviable in certain circumstances due to market factors, rather than the impact of the Council’s proposed policy requirements and standards. These schemes will not come forward until changes in market conditions i.e. an improvement in sales values by comparison to build costs and the development value vs the existing use and competing uses for the site.</p> <p>We consider the GLA’s Viability report and all conclusions, which of that ultimately states tall buildings can be viable in certain situations and therefore supports reasoning for providing a tall buildings policy</p>
<p>The policy should define: When policies conflict, which policy will take precedence</p>	<p>Representation noted. The NSP aims to deliver a document of strategic policies that sets Borough wide guidance on development for new homes, social, green and transport infrastructure. As a strategic plan, looking forward the policies will be tested against previous policies and approved/completed applications to determine effectiveness.</p>

<p>The amendment mentions that tall buildings are encouraged in Peckham and Camberwell and sites identified in those areas for tall buildings. Again this seems to have followed the designation of Peckham as a regeneration area rather than that tall buildings were appropriate taking into account the nature of the neighbourhood.</p> <p>A tall buildings background research paper should be published. For camberwell residents we should be given some respect and not have a plan which will slip in through the side door awful heights for buildings.</p> <p>The statement ‘Some of these site allocations have identified possible sites for tall buildings in Peckham and Camberwell town centres taking account of conservation areas and other heritage assets.’ should be removed and the comments relating to tall buildings on site allocations in Peckham and Camberwell should be removed</p>	<p>The Area Vision and site allocations for Camberwell are described in the New Southwark Plan. These will be used alongside the NSP policies to deliver regeneration and conservation in Camberwell. The Camberwell Action Plan is currently being prepared which sets out the council’s most current strategy in regards to regeneration in Camberwell.</p>
<p>We support the identification that tall buildings are typically appropriate within major town centres, opportunity area cores, action area cores and the Central Activity Zones. The policy identifies that some individual sites where tall buildings may be possible have been identified in the site allocations. We request that the Landmark Court allocation (NSP06) is updated to include reference to the suitability for tall buildings subject to taking into account conservation areas and other heritage assets, given that the site is located in a highly sustainable area and within the CAZ.</p>	<p>Officers do not consider it necessary to reflect NSP06 as a site allocation for tall building development. Due to the site being apart of the CAZ it shall be assessed against all policies in the NSP, including policy P14: tall buildings to understand the impact and suitability. This ensures that developers pay regard to all possible factors and constraints relevant to the site when developing, and that tall building development is correctly implemented.</p>

Following this is an overview of the emerging policy with text in grey setting out how the policy has changed through the influence of consultation feedback on all versions of the New Southwark Plan.

P16: Tall buildings

1. Areas where we expect tall buildings are on Map 1. These are typically within our Major Town Centres, Opportunity Area Cores, Action Area Cores and the Central Activities Zone. Individual sites where taller buildings may be possible have been identified in the site allocations. Some of these site allocations have identified possible sites for tall buildings in Peckham and Camberwell town centres taking account of conservation areas and other heritage assets.

This policy point has been amended from the Options stage due to being

2. Tall buildings must:

- Be located at a points of landmark significance; and
- Have a height that is proportionate to the significance of the proposed location and the size of the site; and
- Make a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings; and
- Not cause a harmful impact on strategic views, as set out in the London View Management Framework, or to our Borough Views; and

At the Options Version stage of consultation it was raised that the policy should reference the London View Management Framework to set the constraints that proposals will be assessed against at application stage, with regard to impact on views.

- Respond positively to local character and townscape; and
- Provide a new publically accessible space at or near to the top of the building and communal facilities for users and residents where appropriate.

Changes implemented were concerns/suggestion raised at the preferred options stage consultation. The policy requirements for developments 30m and above were requested to be made applicable to all tall buildings.

3. The design of Tall buildings will be required to:

- Be of exemplary architectural design and residential quality; and
- *This current policy point was informed by comments received at the Options stage. The original policy requirement was for tall buildings to be slender, well-articulated, and recessive which was removed as this was too subjective to allow for a consistent assessment of tall buildings.*
- Conserve or enhance the significance of designated heritage assets and make a positive contribution to wider townscape character. Where proposals will affect the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) clear and convincing justification in the form of public benefits will be required;
- Avoid harmful and uncomfortable environmental impacts including wind shear, overshadowing, and solar glare; and
- Maximise energy efficiency and prioritise the use of sustainable materials; and
- Have a positive relationship with the public realm, provide opportunities for new street trees, and design lower floors to successfully relate to and create a positive pedestrian experience; and Provide widened footways and routes to accommodate increased footfall.

Reasons

The London Plan requires Development Plans to map the locations where tall buildings will be an appropriate form of development in principle and to indicate the general building heights that would be appropriate. This should be based on the visual, environmental and cumulative impacts of tall buildings and their potential to contribute to new homes, economic growth and regeneration and their public transport accessibility.

Tall buildings, if thoughtfully designed to an exemplary standard, can be an important component in contributing to Southwark's physical regeneration, raising population density, avoiding urban sprawl and increasing the activities and life opportunities on offer for nearby residents. However, tall buildings can look out of place in their surroundings, harm the setting of historic buildings and cause unpleasant environmental effects, especially on the location's microclimate. Detailed modelling and analysis will be required to assess these impacts.

Southwark is an inner city borough that covers a range of areas defined by different characteristics. The borough includes areas of open space, suburbia, riverside flats, Victorian terraces, modern offices, some of which have significant historic value and are located within conservation areas. In

Southwark the heights and scale of development differ greatly from the north which is more urban, with riverfront modern commercial development through to the suburban, terraced houses of the conservation areas further south in the borough.

The riverfront areas of Blackfriars Road, Bankside and London Bridge provide an established height for buildings fronting the river with a number of prominent buildings visible on the skyline including Tate Modern, Kings Reach Tower, Guy's Hospital Tower, New London Bridge House and the Shard. There have been a number of consents for tall buildings applications in Blackfriars Road and Bankside, including One Blackfriars Road, 20 Blackfriars Road, Neo Bankside, and the turbine hall extension of the Tate Modern. The Shard which stands at 309.6 metres, has formed a new pinnacle within the existing cluster of tall buildings around London Bridge station and Guy's Hospital. This tall building has redefined the skyline of the area, making London Bridge a focus for new tall building development.

Elephant and Castle has a number of tall commercial and residential buildings focused around the train, tube and bus station. The regeneration will see the replacement of the existing Heygate Estate and shopping centre, as a result of retail and residential being provided in new tall building developments. There have also been a number of approved tall residential buildings in E&C, including the Strata tower also known as 'The Razor', with newer additions including the Highpoint development, which is the tallest build to rent building in the country.

Old Kent Road Action Area has a Stations and Crossings strategy where tall buildings are proposed or permitted at the most accessible locations.

Tall buildings can also be found in a number of other locations, generally in the form of 1970s housing estates, such as in East Walworth. The regeneration has been introducing new public realm and open space with well designed series of places to improve the local environment..

Other tall buildings are located generally around the town centres, including a few taller elements at Peckham and Canada Water, though these would only be features in the local area and not features on the skyline.

Detailed guidance can be found in site allocations, the Aylesbury Area Action Plan, Canada Water Area Action Plan, Peckham and Nunhead Area Action Plan, Old Kent Road Area Action Plan and Elephant and Castle SPD.

2. Implementation through policy

The process of implementation through working in partnership has informed implementation through policy, as the findings from all stages of consultation and the urban design evaluation section of the NSP tall buildings background paper set out considerations that made it possible to identify appropriate locations where tall buildings could be. These locations identified provide one or more of the following:

- Within the Central Activity Zone and action area cores where we would expect high density development.
- Proximity to major transport hubs which could cater for a potential increased demand on the transport network due to intense development in the area.
- A location that can emphasise point of civic or visual significance, such as at a gateway, major thoroughfare or junction of major thoroughfares and in town centres.
- An area where there are opportunities for tall buildings can contribute to enhancing the public realm or the improving the permeability of the area.
- Focus for regeneration and activity which would suit new large scale intense development.
- Would be of an appropriate scale and character to the surrounds to ensure that buildings do not dominate or repeat the mistakes of the past.
- Through the site visions and site allocations section of the New Southwark plan we have established that tall building development would be more suitable in the following locations:

Central Activity Zone (CAZ)

We consider that appropriate locations where tall buildings could go are in the Bankside, Borough and London Bridge and Blackfriars Road.

Major Town Centres

We consider that appropriate locations where tall buildings could go are in the Elephant and Castle major town centre.

Opportunity Areas

We consider that appropriate locations where tall buildings could go are in the Old Kent Road and Canada Water opportunity areas.

Action Areas

We consider that appropriate locations where tall buildings could go are in the Aylesbury action area cores.

Rest of the borough

We will consider whether tall buildings are appropriate in other parts of the borough by carrying out urban design analysis to consider the sensitivities for tall buildings taking account of conservation areas and other heritage assets. These sensitivities include:

- Topography
- Strategic views
- Setting and views of the Tower of London and Palace of Westminster World Heritage Sites
- Important local views
- Thames Policy Area
- Archaeological Priority Zones
- Scheduled monuments
- Setting and views of Conservation Areas
- Setting and views of listed buildings
- Setting and views of historic parks and gardens, protected open space and the River Thames
- Local character, scale and heights
- Local density

Policy D8 of the New London Plan (CDR1) indicates the Mayor's positive approach to the construction of tall buildings and considers that boroughs should assess all applications for tall buildings against the criteria set out in the New London Plan policy D8, paragraph A – D. This criteria is a reflection of the requirements tall building developments need to meet in the New Southwark Plan's policy P14: tall buildings.

Developments implemented in the identified appropriate locations for tall buildings, in addition to meeting the requirements for tall buildings, need to be of exceptional design. Any tall building proposal should provide consideration of servicing, daylight and sunlight, microclimate and environmental impacts, access to open space and where appropriate, parking. Very large structures can often be designed with higher efficiencies and as a result, higher standards of environmental sustainability can be often achieved in tall buildings. Tall buildings with a mix of dwelling sizes, housing types and tenures can create mixed and balanced communities which are desirable for long term sustainability.

Following this we expect developers to provide Design and Access Statements with all full and outline applications, and applications for listed building and conservation area consent. The Council has established an external 'design review panel' to provide advice on large scale proposals. The panel consists of a number of design professionals who provide expert advice on the quality of architecture and urban design. While the role of the panel is purely advisory, the panel's comments carry a lot of weight and inform decisions on applications.

3. Implementation through development management

We have a number of ways in which we can ensure that all new applications for tall buildings are of a high standard of sustainable design and incorporate inclusive design for accessibility. We have prepared a Sustainable Design and Construction SPD (NSPL11), Residential Design Standards SPD (NSPL10) and Design and Access SPD (NSPL9) that will set out criteria for exemplary design.

We have also developed a set of criteria which will be used to assess tall building proposals in the borough:

- Make a significant contribution to local regeneration
- Located in the right place
- Outstanding architectural quality
- Sensitive to the historic context
- Sustainable design and construction
- Bring life and activity to an area and create vibrant and attractive streets and spaces
- Sensitive to its impact on the local environment
- Comply with application requirements

As this is a strategic borough-wide study that identifies broad locations that could have tall buildings based on key strategic considerations, more detailed consideration of these points are explored in the area-based studies. These studies will also explore the extent to which tall buildings would be appropriate in these areas and provide more detailed consideration of the considerations and how tall buildings or clusters of tall buildings can evolve.

The area based studies are set out as, supplementary planning documents, area action plans and area specific planning documents for areas where we expect most growth and change to occur. We have prepared area action plans for Aylesbury, Canada Water, Peckham and Nunhead and Camberwell, with the Old Kent Road Area Action Plan emerging. These documents will provide more detailed policies on design and conservation, alongside the specification of building heights. Through analysis

such as urban design, transport, characterisation and capacity studies these documents will identify and suitable locations for tall buildings.

We have also prepared supplementary planning document for Blackfriars Road and the Elephant and Castle area which provides more detailed policies on design and conservation which also sets out sites that are suitable for tall building development and more detailed guidance for individual sites. There is specific detailed guidance on all site allocations in the site allocations and visions section of the New Southwark Plan.

Further planning documents that have been prepared or will be prepared to provide more guidance and detail on tall buildings as an area based specific planning document are:

AAPs and SPDs Supporting documents

- Aylesbury AAP (NSPL3) provides a supporting Visual impact assessment (NSPL24) looking at existing heights in the surrounding and concluding with a visual assessment of impacts of the proposed building heights on strategic and sensitive local views.
- The Old Kent Road place making study (NSPL23) alongside the forthcoming Old Kent Road AAPs Tall building study (NSPL25) sets out the potential of regeneration through the scoping of the area and the surrounding neighbourhood. With both documents supporting the Old Kent Road AAP (NSPL6)
- Urban design studies (NSPL26 to NSPL39) have been prepared to assess the approach to our urban design policies and guidance in our adopted and emerging planning documents. Ensuring that tall building development contributes to the urban grain through the additional development of the public realm.
- The Residential Design Standards SPD (NSPL10) sets out the standard of design expected from residential development. It includes guidance and standards on wheelchair housing, minimum room sizes, outdoor amenity space and privacy. This will help ensure all residential developments create high quality and accessible homes that do not have a negative impact on the surrounding area.
- The Sustainable Design and Construction SPD (NSPL11) outlines general design principles that new developments should follow and also sets minimum and preferred standards for topics such as energy use, adapting to climate change, protecting and enhancing biodiversity, conserving water and planning for flood risk. This is to ensure that new development in Southwark is designed and built to have a positive impact on the environment.

LBS Housing Background Papers

- Our Housing evidence base sets out our approach to optimising homes in the borough through the assessment of housing potential on identified sites and their viability.
- The evidence base section is with the inclusion of development housing capacity assessments (NSPL41 to NSPL49) and housing requirements studies (NSPL50 to NSPL58), which has identified density targets and projections within the borough from 2009.
- An update to these figures has been set out in Southwark Five and Fifteen Year Housing Land Supply: 2016 – 2031 (NSPL40) paper. The housing targets presented here are a reduced figure of 23,550 homes over ten years (2019/20-2028/29), which includes 6,010 homes on small sites over ten years.

LBS Design, Heritage and Characterisation studies

- Character studies (NSPL16 to NSPL20) on the Opportunity Areas of Bankside, Borough and London Bridge, Old Kent Road, Peckham and Elephant and Castle identify those elements which combine to form each area's unique character and strategically placing these areas in its wider context. These documents set out principles for the future management of Opportunity Areas and responds to the question, how change for elements such as tall buildings can be managed alongside each of the unique character settings within an area.

- Surveying and analysing the historical heritage of Old Kent Road (NSPL21) in addition to the evolution of the above areas to identify opportunities and threats to local character.
- Setting out principles for the future management of these Opportunity Areas and responding to how change for elements such as tall buildings can be managed alongside each of the unique character settings within an area.
- Conservation Area Appraisals (NSPL59 to NSPL106) have been prepared, are being reviewed or will be prepared for most of the areas identified. These areas are available on the Southwark website for review.

In addition to this the Council has prepared conservation area appraisals for most of the 48 conservation areas and around 908 listed buildings and monuments we currently have. Throughout the borough there are many attractive and historic buildings, monuments and sites that reflect Southwark's rich history and add to the unique character and identity of places. All new development should preserve or enhance the historic character and appearance of buildings or areas of historical or architectural significance. This will generally mean that tall buildings will not be acceptable in conservation areas. The impact of buildings located outside but close to conservation areas on the character of those areas will have to be considered in relation to any relevant conservation area appraisal. There are also conservation areas in adjoining boroughs that may be affected by development in Southwark. The appraisals give more detailed guidance on the type of development that would be appropriate to preserve and enhance the historic environment and heritage assets in accordance with the NPPF.

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