

Core strategy

CDB11. Borough-wide Tall Buildings Background Paper

March 2010



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1. INTRODUCTION

- 1.1 This paper covers the background and research that has informed the suitable locations for tall buildings as established in Policy 12 and supporting text contained within our core strategy. It summarises our evidence base, describes our strategy and our reasons for selecting the approach we have taken.
- 1.2 This document should be considered alongside the Core Strategy: Borough-wide Tall Building Research Paper (CDD1) and Core Strategy: Bankside, Borough and London Bridge Opportunity Area : Stage 1 - Tall Building Research Paper (CDD2).
- 1.3 Figure 1 shows the relationships of these documents:

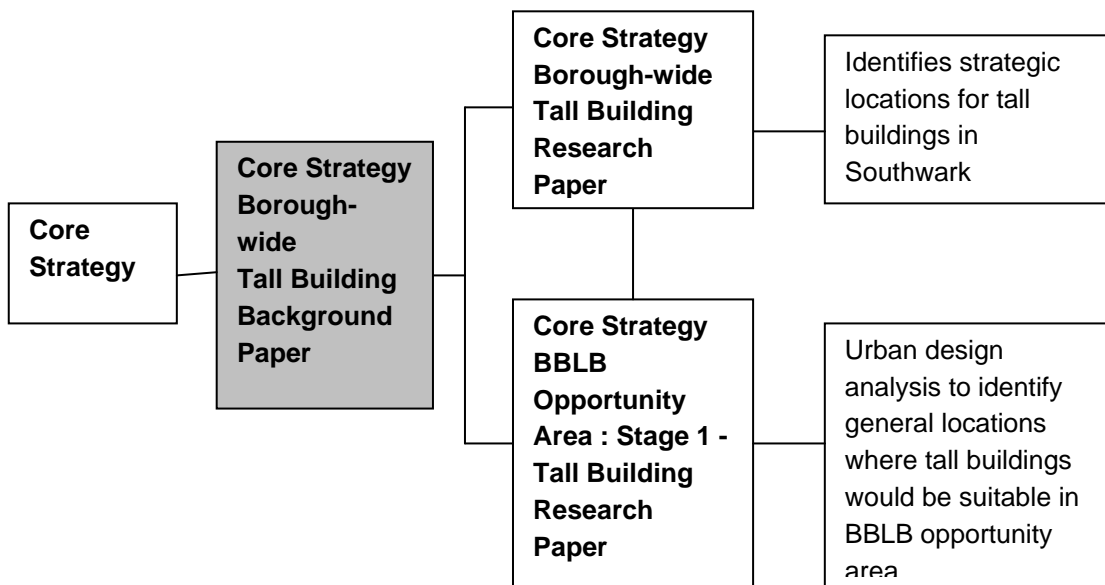


Figure 1: Relationship of documents

2. POLICY BACKGROUND

National

Planning Policy Statement 1: Delivering sustainable development, 2005

- 2.1 PPS1 (CDN1) sets out the Government's commitment to creating more sustainable patterns of development. Paragraph 18 advises that planning policies should promote high quality design in the layout of new developments and individual buildings over the lifetime of the development.
- 2.2 Planning authorities should plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes. Good design should contribute positively to making places better for people. Design which fails to improve the character of an area should not be accepted.
- 2.3 Paragraph 34 highlights how design policies should avoid unnecessary detail, concentrating on guiding the overall scale, density, massing, height, landscape, layout and access of new development in relation to neighbouring buildings and the local area more generally.
- 2.4 Paragraph 19 outlines how planning policies and decisions should be based on the potential impacts, positive and negative on the environment of development proposals.
- 2.5 Planning policies should promote the more efficient use of land through higher density, mixed use development and the use of suitably located previously developed land and buildings back to beneficial use to achieve the targets the Government has set for development on previously developed land (paragraph 27viii).
- 2.6 Planning policies should enhance as well as protect biodiversity, natural habitats, the historic environment and landscape and townscape character (paragraph 27ix).

Planning Policy Statement 6: Planning for town centres, 2005

- 2.7 PPS6 (CDN45) sets out the Government's key objective for town centres to promote their vitality and viability by promoting and enhancing existing centres, by planning for the growth and development in such centres (paragraph 13). Paragraphs 2.19 -2.22 highlight the importance of promoting high-quality design and making efficient use of land.

- 2.8 Paragraph 2.3 advises local authorities to actively promote growth and manage change in town centres by selecting appropriate existing centres to accommodate the identified need. Paragraph 2.20 of the guidance also promotes making better use of existing land and buildings and advises local authorities to create planning policies which encourage well-designed, and where appropriate, high density development within/around existing centres, including promotion of mixed-use development and areas

Planning Policy Guidance 13: Transport, 2001

- 2.9 Paragraph 3 of PPG13 (CDN9) states that planning has a key role in delivering the Governments integrated transport strategy. Shaping the pattern of development and influencing the location, scale, density, design and mix of land uses, can help reduce the need to travel and the length of journeys, and make it safer and easier for people to access jobs, shopping, leisure facilities and services by public transport, walking, and cycling.
- 2.10 Paragraph 6 advises local authorities to actively manage the pattern of urban growth to make the fullest use of public transport and focus major generators of travel demand near to public transport interchanges, promoting intensive development in these areas and on such sites.

Planning Policy Guidance 15: Planning for the Historic Environment, 1994

- 2.11 At the time of the publication of this document, new Planning Policy Statement (PPS) 5 superseded PPG 15 & PPG 16. This new document retains the principles set out in PPG 15 with concern for the historic environment.
- 2.12 PPG15 (CDN10) sets out national guidance on the identification and protection of historical features in the environment, including historic buildings, conservation areas, and other elements of the historic environment.
- 2.13 Paragraph 2.14 sets out that careful consideration is required for the design of new development located near historic buildings, and that the historic assets are not set apart but integrated into the area. New development should respect the setting, consider the existing scale, height and massing and alignment of the existing context.
- 2.14 Paragraph 2.16 sets out that within the setting of listed buildings, new development should pay special regard to the significance and character of the setting of the existing building. Paragraph 2.17 sets out that the setting could be a wider area, such as a grouping of buildings and the space created between them. Where the building is a visible

element on the street, the street and development on the street would form the setting. Tall or bulky buildings in the distance might impact on the setting of a listed building or historic skyline.

- 2.15 Paragraph 2.23 sets out that there is a need to protect the World Heritage Sites for the benefit of future generations as well as our own and that proposals for new development should be well considered for their likely effect on the site or its setting.
- 2.16 Paragraph 2.24 sets out that new development should consider its impact on registered parks or gardens and their setting.
- 2.17 Paragraph 2.26 sets out that development plans should protect the important elements of the wider historic landscape and that new development should be consistent with maintaining the overall historic character and features in that area.
- 2.18 Section 4 of the document sets out considerations for Conservation Areas and their settings, which include:
- As Conservation Areas are varied in character a coherent assessment of the area can assist in defining the areas special architectural or historic interest which is desirable for preservation or enhancement. (Paragraph 4.4, 4.5, 4.9)
 - Consideration should be given to development outside of a Conservation Area as to its impact on the setting or views into or out of the Conservation Area. (Paragraph 4.14)
 - Conservation of an area should not prevent new development but that authorities policies and guidance should ensure that new development contributes positively. (Paragraph 4.16)
 - Where appropriate new development in gap sites provide an opportunity to enhance the area. (Paragraph 4.16)
 - New development should be designed with respect to the wider context and character of an area, which already has a well established appearance and character of its own. (Paragraph 4.17)
 - When considering new development in detail, proposals should show proposals in their setting and provide special regard to the scale, height, massing and form. (Paragraph 4.18)

Planning Policy Guidance 16: Archaeology and Planning, 1990

- 2.19 At the time of the publication of this document, new Planning Policy Statement (PPS) 5 superseded PPG 15 & PPG 16. This new document retains the principles set out in PPG 16 with concern to archaeological remains.
- 2.20 PPG16 (CDN11) sets out national guidance on the archaeological remains on land, and how they should be preserved or recorded. Paragraph 6 advises that archaeological remains are a finite and non-

renewable resource and care must be taken to ensure that archaeological remains are not needlessly destroyed. The PPG recognises that it is not always feasible to save all archaeological remains, the importance of which needs to be weighed against other factors including the need for the proposed development (paragraph 8).

Guidance on tall buildings, CABE and English Heritage, July 2007

- 2.21 CABE and English Heritage Guidance on Tall Buildings (CDN25) 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. Paragraph 4.4 of the guidance states: “...to be acceptable, any new tall building should be in an appropriate location, should be of first class design quality in its own right and should enhance the qualities of its immediate location and wider setting. It should produce more benefits than costs to the lives of those affected by it.” Paragraph 4.3 of this guidance stresses the need for tall buildings to integrate with their immediate surroundings in a satisfactory way at the lower levels.
- 2.22 The Government endorses this guidance which is capable of being a material consideration in the determination of planning applications (the Inspectors Report and letter from the Secretary of State on 1 & 20 Blackfriars Road Public Inquiry demonstrates this).¹ The CABE guidance provides a means of ensuring compliance with a number of PPS 1 objectives, particularly key principles 1(i) and (iv) pertaining to integrating sustainable development and design respectively. PPG 15 and PPG 16 are also relevant where the historic environment or archaeology are likely to be affected and this guidance provides clarity on the protection of the historic environment when planning for tall buildings.
- 2.23 Paragraph 2.7 of the guidance advises local planning authorities 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. In addition to considering the wider objectives of sustainable urban design that apply to all new development, as set out in *By design - Urban Design in the planning system: towards better practice*² this should include:
- taking into account the historic context of the wider area
 - carrying out a character appraisal of the immediate context

¹ Report to the Secretary of State, 1 & 20 Blackfriars Road Public Inquiry, December 2008
Secretary of State decision letter, 1 & 20 Blackfriars Road Public Inquiry, March 2009

² Urban Design in the planning system: towards better practice, DETR/CABE, 2000

- constraints, including natural topography, urban grain, scale and height, landmark buildings and their settings and important local views, prospects and panoramas.
- identifying sites where the removal of past mistakes might achieve a similar outcome.
- protection of the historic environment when planning for tall buildings.

2.24 Section 4 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 for assessing tall building proposals. This set of criteria has been developed in accordance with the CABI and English Heritage Guidance and the London Plan.

Understanding Place: Historic Characterisation for Planning and Development Draft Document, English Heritage, July 2009

2.25 Understanding Place: Historic Characterisation for Planning and Development Draft Document (CDN26) document contains techniques on historic, spatial and urban landscape characterisation. Page 5 of the document recommends how these methods should be used at a regional and sub-regional level to help identify the most appropriate location for major development and infra-structure projects, to inform their design and avoid or minimise negative impacts on the historic environment. By combining the characterisation 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.

By Design – Urban Design in the planning system: towards better practice DETR/CABI, 2000

2.26 By Design (CDN27) promotes higher standards in urban design and provides sound, practical advice to help implement the Government's commitment to good design, reinforcing the call in the Urban Task Force's report "Towards an Urban Renaissance" for earlier, greater and better-informed attention to urban design. This guide is intended as a companion to the PPGs.

2.27 Page 45 details how policies on heights should consider:

- scale, height and massing of proposed development in relation to context, landmarks, existing and new views
- contribution to a clearly defined public realm of routes and spaces

- protection from down draughts from tall buildings and lateral winds

Building for Life, CABE, November 2008

2.28 Building for Life (CDR49) is the national standard for well-designed homes and neighbourhoods. Although it does not constitute policy, Building for Life provides direction consistent with policy in promoting design excellence and celebrates best practice in the house building industry. The 20 Building for Life criteria embody our vision of functional, attractive and sustainable housing. New housing developments are scored against the criteria to assess the quality of their design.

Regional***The London Plan Spatial Development Strategy for Greater London, Mayor of London, February 2008***

- 2.29 The London Plan (with consolidated alterations, GLA 2008) (CDR1) provides the regional policy framework for tall buildings.
- 2.30 Policy 4B.8 : *Respect local context and communities* says that boroughs should work with local communities to recognise and manage local distinctiveness to ensure that developments preserve or enhance the local context and needs of London's diverse population.
- 2.31 Policy 4B.9: *Tall Buildings, Location* says the Mayor will promote the development of tall buildings where:
- they create attractive landmarks enhancing London's character
 - help to provide a coherent location for economic clusters of related activities and/or act as a catalyst for regeneration
 - and where they are also acceptable in terms of design and impact on their surroundings
- 2.32 It further states that the Mayor will work with boroughs to help identify suitable locations for tall buildings that should be included in DPDs. These may include part of the Central Activities Zone and some Opportunity Areas.
- 2.33 Policy 4B.10: *Large-scale buildings – Design and Impact* clearly underlines the importance of good design for tall buildings. This policy requires 'All large scale buildings including tall buildings should be of the highest quality design'. The policy then sets out a number of particular criteria that developments should achieve to be of the highest quality design including meeting the requirements of the London View Management Framework (LVMF).

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- 2.34 Policies 4B.11 to 4B.15 sets out the Mayor's approach to protect and enhance London's historic environment. These sections set out that:
- DPD policies should ensure that built heritage will contribute to London's environment and economy while accommodating growth,
 - Borough should ensure that heritage assets are considered as part of a wider strategy; that policies are adopted for the protection and enhancement of historic assets; and that inclusive solutions provide access to the historic environment.
 - The Mayor will and boroughs should support conservation led regeneration schemes.
 - That boroughs DPD should contain policies that protect the World Heritage Site and where appropriate enhance the setting and that boroughs should take into account, and give appropriate weight to, World Heritage Site Management Plans.
- 2.35 Policies 4B.16, 4B.17 and 4B.18 establish the London View Management Framework which identifies a number of strategic views important to London. The policies provide an overview for how the views will be managed and assessed. This is explored in more detail in the London View Management Framework Supplementary Planning Guidance document.
- 2.36 The London Plan provides the following information on density:
- 2.37 Objectives 1, 2 and 5 of the London Plan set out to accommodate London's growth within its boundaries, make London a better city for people to live in and improve London's accessibility.
- 2.38 Paragraph 1.58 says that economic and population growth in higher density, intensive developments will make it more economic to ensure the provision of broadband and new technologies.
- 2.39 Paragraph 2.13 sets out that opportunity areas generally include major brownfield sites with capacity for new development and places with potential for significant increases in density. Their development should be geared to the use of public transport and they are either located at areas of good access or would require public transport improvements to support development.
- 2.40 Policy 3A.2 set targets for housing development which local authorities, through their core strategies should seek to exceed. To do this, development plans should identify new sources of supply including having regard to intensification of housing provision through development at higher densities particularly in opportunity areas and with intensification of housing provision through development at higher densities where consistent with the principles of sustainable residential quality set out in the density matrix in Table 3A.2. Also to review

existing and proposed sites on the proposals map to consider capacity of housing and to monitor approvals against targets.

- 2.41 Policy 3A.3 says that boroughs should, ensure that development proposals achieve the maximum intensity of use compatible with local context, the design principles in Policy 4B.1 and with public transport capacity. Also that boroughs should develop residential density policies in their DPDs in line with this policy and adopt the residential density ranges set out in Table 3A.2 and which are compatible with sustainable residential quality. Furthermore that the Mayor will refuse permission for strategic referrals that, taking into account context and potential transport capacity, under-use the potential of the site.
- 2.42 Paragraph 3.20 says that the Mayor will expect a maximum contribution towards housing provision to be achieved by checking that DPD reviews and planning applications referred to him reflect the density matrix in Table 3A.2. He considers the density matrix to set a strategic framework for appropriate densities at different locations. It aims to reflect and enhance existing local character by relating the accessibility of an area to appropriate development. Guidance on the application of the density matrix to individual sites is set out in the Mayor's Housing SPG.
- 2.43 Paragraph 3.21 says that the matrix provides a tool for increasing density in situations where transport proposals will change the public transport accessibility ranking. Such changes allow a shift to a higher density range. The form of housing output should be determined primarily by an assessment of housing requirements and not by any assumption as to the built form of the development.
- 2.44 Paragraph 3.22 says that appropriate density ranges are related to setting in terms of location, existing building form and massing, and the index of public transport accessibility. This indicates the ease and extent of access by public transport or, where it can be used as a proxy, the degree of access to the public transport network. PTALs are calculated for grid points to produce maps showing accessibility. The values are determined by walking times to public transport access points such as bus stops and stations together with the frequency and reliability of the service. PTAL values of 1 to 6 are identifiable for each location with 1 being a low level of accessibility and 6 being the best.3.22 Appropriate density ranges are related to setting in terms of location, existing building form and massing, and the index of public transport accessibility (PTAL).
- 2.45 There are three zones, the characteristics of which are identified in paragraph 3.23 of the London Plan as follows:
- central – very dense development, large building footprints and buildings of four to six storeys and above, such as larger town centres all over London and much of central London

- urban – dense development, with a mix of different uses and buildings of three to four storeys, such as town centres, along main arterial routes and substantial parts of inner London
 - suburban – lower density development, predominantly residential, of two to three storeys, as in some parts of inner London and much of outer London
- 2.46 Paragraph 3.199 says that central London's accessibility and environment should be enhanced by locating high density developments at points of good public transport accessibility where sufficient capacity exists or is being introduced.
- 2.47 Policy 3.17 says that DPD policies should reduce transport congestion through locating high density developments at accessible locations.
- 2.48 Paragraph 3.268 says that higher densities will improve town centres through contributing to London's evening economy.
- 2.49 Paragraph 4.120 says that the compact city and intensive development do not necessarily imply high-rise buildings. London has achieved some of its highest residential densities in relatively low-rise areas, while isolated, poorly designed tower blocks have not necessarily delivered high density or usable public space.

The London Plan, Spatial Development Strategy for Greater London, Consultation draft replacement plan Mayor of London, October 2009

- 2.50 The consultation draft replacement London Plan (CDR2) has shifted the emphasis away from promoting tall buildings towards the careful management of the planning and design of tall buildings.
- 2.51 Policy 7.4 – *Local character* states that development should have regard to the local character and scale of the surrounding area and provides considerations to ensure that architectural response suits the local context.
- 2.52 Policy 7.6 – *Architecture* states that architecture should be of high quality material and design and should be a positive contribution in the local and city context and provides a list of criteria to ensure that architecture will be of the highest quality.
- 2.53 Policy 7.7 - *Location and design of tall and large buildings* states that applications for tall buildings should include an urban design analysis that demonstrates the proposal meets a defined set of criteria, including:

- location generally limited to sites in the Central Activity Zone, Opportunity Areas, Areas of Intensification or town centres that have good access to public transport
- good relation to the scale and character of surrounding buildings and public realm, particularly at street level
- individually or as a group, form a distinctive landmark that emphasises a point of civic or visual significance, and enhances the skyline and image of London
- ground floor activities that provide a positive relationship to the surrounding streets and have public access to upper floors, where appropriate
- should not impact adversely on local or strategic views
- should not be encouraged in areas sensitive to tall building impact including conservation areas, the setting of listed buildings and World Heritage Sites, historic parks and gardens or other areas designated by boroughs as being unsuitable for tall buildings.

2.54 We are working with the Mayor on to identify appropriate locations for tall buildings, applying the above criteria. The Draft Bankside Borough & London Bridge Supplementary Planning Document / Opportunity Area Planning Framework (CDSPD1) is one example of such joint work.

2.55 Policies 7.8 to 7.10 sets out the Mayor's approach to protect and enhance London's historic environment. These sections set out that:

- London's historic environment should be preserved and restored, and that development should provide consideration to a site's archaeology.
- Regeneration schemes should consider heritage assets and their significant qualities
- New development in the setting of a World Heritage Site should not have a negative impact, and that the Mayor will work relevant stakeholders to develop supplementary guidance to define these settings.

2.56 Policies 7.11 and 7.12 establish the London View Management Framework which identifies a number of strategic views important to London. The policies provide an overview for how the views will be managed and assessed. This is explored in more detail in the London View Management Framework Supplementary Planning Guidance document.

2.57 The consultation draft replacement London Plan provides the following information on density:

2.58 Paragraphs 2.38 and 2.64 say that while the density of housing varies widely across Inner London, generally higher levels of public transport accessibility open up scope for higher density development here

(Policies 3.4–3.5). Paragraph 2.40 says that higher densities in inner London improves the quality of and access to open space ((7.18) and play space (3.6) and also offers particular opportunities for developing district energy infrastructure (see Policies 5.5–5.6).

- 2.59 Policy 3.4 says that LDFs should optimise housing potential in line with table 3.2 based on different types of location taking into account local context, the design principles in Chapter 7 and public transport capacity. Paragraph 3.22 says that the density ranges are broad and they should not be applied mechanistically. Also that these broad ranges also provide the framework within which boroughs can refine local approaches to implementation of this strategic policy through their LDFs. Also that they can also provide a tool for increasing density in situations where transport proposals will improve public transport accessibility in the future.
- 2.60 Table 3.2 sets out three density zones, the characteristics of which are identified in paragraph 3.23 of the London Plan as follows:
- central – very dense development, large building footprints and buildings of four to six storeys and above, such as larger town centres all over London and much of central London
 - urban – dense development, with a mix of different uses and buildings of three to four storeys, such as town centres, along main arterial routes and substantial parts of inner London
 - suburban – lower density development, predominantly residential, of two to three storeys, as in some parts of inner London and much of outer London
- 2.61 Paragraph 3.32 says that at the neighbourhood level a new housing SPG will address the relationship between strategic density Policy (3.4) and different local approaches to its implementation.
- 2.62 Table 3.3 sets out unit sizes and paragraph 3.33 says that the larger room sizes are especially important in areas with higher densities.
- 2.63 Paragraph 4.42 says that areas in and around town centres will be most appropriate for higher density development in line with the locational strategy in Chapter 2.
- 2.64 Map 5.1 shows heat demand density across London, which when used in conjunction with other relevant spatial factors (such as social housing density, major development and regeneration areas) can help identify opportunities for decentralised energy networks.

Draft City Fringe Opportunity Area Framework, Mayor of London, February 2008

- 2.65 Draft City Fringe Opportunity Area Framework (CDR29) outlines the proposals for tall buildings based on London Plan policy, emerging

policies of the local authorities that are considered to be in general conformity with the CABE/English Heritage Guidance on Tall Buildings (CDN25).³ The document advises that the identification of suitable locations should be included within UDPs and sub-regional Development Frameworks, including Opportunity Area Planning Frameworks.

2.66 Paragraphs 4.5 to 4.12 details a number of considerations and reasons for tall building locations. These include:

- Historic context and conservation areas - promoting the role of tall buildings to absorb intense development thereby preserving the finer grain of conservation areas
- Existing and proposed tall buildings - a number of recently taken planning decisions that have tested policy context
- Sustainability – the densification of land uses promote sustainable communities through proximity of land uses
- Proximity to public transport
- Promoting regeneration and building on existing economic clusters

London View Management Framework, The London Plan Supplementary Planning Guidance, Mayor of London, July 2007

Draft Revised Supplementary Planning Guidance, May 2009

2.67 The London Plan (CDR1 & CDR2) identifies a number of strategic views important to London. The Mayor requires management of these views in accordance with London Plan policies 4B.16, 4B.17 and 4B.18 and policies 7.11 and 7.12 of the draft revised Supplementary Planning Guidance.

2.68 The London View Management Framework SPG (CDR42 & CDR13) identifies and maps the strategic views identified in the London Plan (CDR1 & CDR2) and sets out how they will be protected and how the impacts of new development will be tested.

Recommendation for living at Superdensity, Design for Homes, July 2007

2.69 Recommendation for living at Superdensity (CDR50) does not constitute policy but provides a useful basis for further work on housing design guidance. The publication makes 10 recommendations for living at 'superdensity' including facilitating balanced communities, outdoor space and the public realm and environmental sustainability. To create successful and sustainable communities, more homes of the right size, type and tenure, built at higher densities in appropriate locations are

³ City Fringe Opportunity Area Framework, Mayor of London, February 2008

needed. The paper highlights how Urban Renaissance thinking promotes sustainable urban intensification over urban sprawl. It says *'Higher densities support the capital's drive in three ways:*

- *In social terms, because it encourages mixed communities, enhancing social capital and reducing social isolation*
- *In economic terms, because it brings economies of scale in services and markets*
- *In environmental terms, owing to a reduced carbon footprint⁴*

Local

Southwark 2016: Sustainable Community Strategy, Southwark Council, 2006

2.70 Southwark 2016 (CDL2) is the Sustainable Community Strategy for the borough. The Strategy guides the work of all statutory agencies in Southwark, as well as partners in the voluntary, faith and business sectors. It also takes account of trends emerging in the borough, in neighbouring boroughs and in Greater London itself. Southwark 2016's objectives are:

- *'improving individual life chances*
- *making the borough a better place for people*
- *delivering quality public services'⁵*

The Southwark Plan, The framework for all land use and development in Southwark, Southwark Council, 2007

2.71 The Southwark Plan (CDL1) sets out the design and conservation policies for the borough.

2.72 Policy 3.20 *Tall Buildings* says 'Permission may be granted for buildings which are significantly taller than surroundings or have an impact on the skyline, on sites which have excellent public transport facilities, located in the CAZ (particularly opportunity areas) outside landmark viewing corridors'. Any building over 30m (25m in Thames Policy Area) should make a positive contribution to the landscape/ located at a point of landmark significance/high design standards/relates well to context, especially at street level.

2.73 Paragraph 3.18 explains how tall buildings can raise density around transport nodes, avoiding urban sprawl and contributing to regeneration

⁴ Recommendations for Living at Superdensity, HTA, Levitt Bernstein, PRP & Pollard Thomas Edwards, July 2007

⁵ Southwark 2016: Sustainable Community Strategy, Southwark Council, 2006

Core Strategy: Borough-wide Tall Buildings Research Paper, Southwark Council, March 2010

- 2.74 The Borough-wide Tall Building Research Paper (CDD1) sets out the approach and analysis to establish the suitable locations for tall buildings in Southwark. This reviews urban design analysis to identify the general locations where tall buildings would be appropriate, inappropriate and sensitive in the borough and ensure that new tall building development preserves or enhances the significance of the historic environment and heritage assets, in accordance with Planning Policy Statement (PPS) 5 (CDN103).
- 2.75 The study has identified the following locations:
- Bankside, Borough and London Bridge Opportunity Area
 - Elephant and Castle Opportunity Area
 - Peckham and Nunhead Action Area core
 - Aylesbury Action Area core
 - Canada Water Action Area core
- 2.76 This document should be considered alongside the Core Strategy: Bankside, Borough and London Bridge Opportunity Area : Stage 1 - Tall Building Research Paper (CDD2).

Draft Bankside Borough and London Bridge Supplementary Planning Document / Opportunity Area Planning Framework, Southwark Council, 2009

- 2.77 The Draft Bankside Borough and London Bridge (BBLB) Supplementary Planning Document (SPD) / Opportunity Area Planning Framework (OAPF) (CDSPD1) document sets out the overall plan and detailed guidance for how development in Bankside, Borough and London Bridge Opportunity Area should occur. The SPD / OAPF will make sure development creates an exciting and successful place and covers a range of important topics including the design of development, building heights, what uses are appropriate and how new development should help improve streets and public spaces.
- 2.78 It covers the heights which are appropriate in different locations and a defined set of criteria that tall buildings need to meet. The criteria for evaluating tall building proposals have been developed in accordance with CABE and English Heritage guidance and the considerations in the consultation draft replacement London Plan.
- 2.79 The appropriate locations for tall buildings have been established through a two stage Tall Building Study, through the Core Strategy: Bankside, Borough and London Bridge – Tall Buildings Background Paper and the Bankside Borough and London Bridge SPD/OAPF - Tall Buildings Study.

Core Strategy: Bankside Borough and London Bridge Opportunity Area : Stage 1 - Tall Buildings Research Paper, Southwark Council, March 2010

2.80 The BBLB Opportunity Area : Stage 1 - Tall Buildings Research Paper (CDD2) sets out the approach and analysis to establish the suitable locations for tall buildings in the Bankside, Borough and London Bridge Opportunity Area. This study has been undertaken in two stages. This first stage of the study reviews urban design analysis to identify the general locations where tall buildings would be suitable in the Opportunity Area and has identified the following locations:

- Area around London Bridge Station, Guy's Hospital Campus and Tooley Street
- Area around Blackfriars Road North

2.81 The methodology used to identify these locations has been carried out in accordance with guidance set out in paragraphs 2.19 – 2.22 of *PPS 6* (CDN45) and paragraph 6 of *PPS13* (CDN9), which advise local authorities to direct and manage change and growth in existing town centres by promoting high-quality design and making efficient use of land. The tall building study includes urban design analysis and mapping and has followed the approach suggested by CABE and English Heritage Guidance on Tall Buildings (CDN25).

2.82 This document should be considered alongside Core Strategy: Borough-wide Tall Building Research Paper (CDD1). The second stage of the study can be found in the Bankside Borough and London Bridge (BBLB) : Stage 2 - Tall Buildings Study (CDD3)

Bankside Borough and London Bridge : Stage 2 - Tall Buildings Study, Southwark Council, December 2009

2.83 The BBLB : Stage 2 – Tall Building Study (CDD3) is the second stage of the tall building study, is a more detailed study looks in more detail at the areas identified as appropriate for tall building in the Core Strategy: Bankside, Borough and London Bridge Opportunity Area - Tall Building Research Paper (CDD2). This study provides a comprehensive analysis of the two study areas to identify the specific sites where tall buildings would be appropriate within the areas identified and the particular design opportunities, constraints and sensitivities for tall buildings on these sites.

2.84 This stage of the study includes more detailed urban design analysis and mapping and has followed the approach suggested by CABE and English Heritage Guidance on Tall Buildings (CDN25). In order to understand the considerations for these sites, the study has also included procurement of a three dimensional model to undertake a

desk based view analysis of strategic, local and dynamic views in order to understand the potential effect that tall building development in these views. This study also lists the detailed requirements for tall building applications, including criteria which tall building applications should demonstrate that they can satisfy and the supporting material required for an application submission.

Elephant & Castle Supplementary Planning Guidance, Southwark Council, 2008

- 2.85 Elephant and Castle Supplementary Planning Guidance (CDSPD10) is provided in the form of a development framework was approved by the council in February 2004. The SPG recognises the important role that regeneration of the Elephant and Castle will play in the wider development of London South Central as a focus for investment and jobs. The SPG comprises an area specific Development Framework, designed to guide and inform comprehensive change and regeneration, so that development doesn't happen in a piecemeal fashion, whereby opportunities to affect positive change might be marginalised by competing interests. The Elephant and Castle area is identified as an Opportunity Area in the London Plan.
- 2.86 The Development Framework incorporates a new mixed-use town centre for the area which takes advantage of the excellent public transport accessibility in Elephant and Castle. The SPG sets out guidance for new shops, restaurants, cafes focused around a new and extended Walworth 'High Street', a market square and a town park.
- 2.87 The Elephant and Castle Supplementary Planning Guidance provides a strategy for building height in the area. The strategy designates:
- a core cluster zone at the heart of the development where it is envisaged that the tallest, city scale buildings will be located
 - a secondary tall building cluster zone comprising key sites located around the core cluster and the civic square
 - a more local tall building zone adjacent to St Mary's churchyard
 - outside the tall building zones, the establishment of a building height profile that falls away from the centre in response to the existing context and building form profile
 - a height profile that maximises environmental and microclimatic benefits and reduces exposure of residents and open spaces to noise and pollution.
- 2.88 Applications for tall buildings that are not within the designated tall building zone as defined in the Elephant and Castle Supplementary Planning Guidance are unlikely to be considered favourably in order to achieve a building height profile that forms a satisfactory transition

between the centre and the existing context and building form profile of surrounding areas.⁶

Elephant & Castle Enterprise Quarter Supplementary Planning Document, Southwark Council, September 2008

- 2.89 The Elephant and Castle Enterprise Quarter SPD (CDSPD11) provides stakeholders with detail regarding acceptable types of development within the area and sets out specific detail on land-use and other aspects of urban form within the area to the north-west of the core Elephant and Castle Opportunity Area. It also provides further guidance on Policy 6.1 of the Southwark Plan, which relates to the Elephant and Castle Opportunity Area.
- 2.90 In terms of land-use, a key objective of the vision for the Enterprise Quarter centres on bringing forward development of vacant or underused sites, particularly around London South Bank University (LSBU), which is the main occupier and landowner in the area. Extending the concentration of town centre activity proposed for the core area northwards to provide a boost to the Enterprise Quarter forms another objective, as does the introduction of new uses to the area to enrich the variations in character between different locations within the Quarter.
- 2.91 The building heights strategy provides information on appropriate heights and proposed locations for landmark tall buildings and other landmarks.

Aylesbury Area Action Plan, Southwark Council, January 2009

- 2.92 The Aylesbury AAP (CDAAP1) was found sound by a Planning Inspector in November 2009 and is due to be adopted in January 2010. The Aylesbury AAP highlights particular opportunity areas for taller landmark buildings. The building heights strategy for the AAP area proposed 2-4 storeys buildings across much of the area with a greater height of mostly between 7-10 storeys along the main routes of Thurlow Street and Albany Road. There will be some taller buildings to mark important locations with the tallest at around 15-20 storeys at the junction of Thurlow Street and Albany Road.
- 2.93 Nine view locations were assessed for their visual impacts in the area. The visual assessment undertaken for the Aylesbury AAP concluded that the scale, mass and heights of the development proposed in the masterplan would generally have a moderately to highly beneficial impact on the visual quality of the area.⁷

⁶ A Development Framework for the Elephant & Castle, Adopted Supplementary Planning Guidance, February 2004

⁷ Background paper: Visual impact assessment, Aylesbury Area Action Plan, May 2009

- 2.94 Further detail can be found in the Aylesbury AAP report and the Visual impact assessment (CDD6).

Draft Peckham & Nunhead Area Action Plan, Stage 1: Issues & Options Report, March 2009

- 2.95 The Peckham and Nunhead Area Action Plan (CDAAP3) covers the two community council areas of Peckham and Nunhead and Peckham Rye. There is a core area around the town centre where major development is proposed and a wider area where improvements will be of a smaller scale and more focused on accessibility, health and safety and public realm.

- 2.96 The area action plan will change the planning policies for Peckham and Nunhead and will control things like:

- the look and function of the town centre, including the mix of shops and other activities
- what is built on different sites
- the size and design of new buildings
- the amount and type of new homes built and where they go
- the impact of new development on the environment and traffic
- the community facilities needed to support the community

- 2.97 Generally in Peckham new buildings should be of a similar height and scale to existing buildings in the town centre. The Peckham & Nunhead Area Action Plan provides possible locations for taller buildings at specific sites where these would allow landmark development and improvements to public spaces. These locations have not been decided and further studies will be undertaken as part of the AAP.

Draft Canada Water Area Action Plan, Southwark Council, January 2010

- 2.98 The Canada Water AAP (CDAAP2) 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.

- 2.99 Prevailing building heights on sites around the Canada Water basin should be between 5 and 8 storeys. This would help enable mixed use developments which will help support shops and businesses and create more life at different times of day. With a tube station, an overground station and a bus station, higher PTALs in the town centre area can support higher densities to make redevelopment of key sites in the town centre viable.

- 2.100 Tall buildings in Canada Water will be located in the core area only. These buildings can act as landmarks and would help make the area

easier to navigate around by marking the town centre and key locations such as the new plaza and the tube stations. There is a protected view of St Paul's Cathedral and Tower Bridge from Greenwich Park which means that buildings on the shopping centre site should not be more than 30m high (roughly 10 storeys). Two sites which have been identified as suitable locations in the AAP area. For details of these sites please refer the Canada Water Area Action Plan.

- 2.101 Planning permission has already been granted for a 26 storey building on a site located facing the Canada Water tube and bus stations. The building is being designed to complement the existing context was approved as it lies outside the strategic viewing corridor. It is envisaged that the tall building will act as a 'gateway' and will form a landmark within the townscape⁸. Further detail can be found in the Canada Water Site A Environmental Statement.
- 2.102 In 2008 the Council commissioned Benoy to test specific elements of the urban framework options for Canada Water town centre. The study includes 3D modelling studies and view assessments and their final report will inform the preparation of the AAP through a series of concept studies.⁹
- 2.103 Further detail can be found in the relevant character and conservation area appraisals, the Benoy Masterplan Concept Proposals and the Canada Water Area Action Plan (AAP), the Canada Water Site A Environmental and Design & Access Statements.

Residential Design Standards Supplementary Planning Document, Southwark Council, 2008

- 2.104 The Residential Design Standards SPD (CDSPD8) sets out the standard of design expected from residential development. This will help ensure all residential developments create high quality and accessible homes and that they do not have a negative impact on the surrounding area. It includes guidance and standards on wheelchair housing, minimum room sizes, outdoor amenity space and privacy.

Design and Access Statement Supplementary Planning Document Southwark Council, 2007

- 2.105 The Design and Access Statement SPD (CDSPD9) clarifies what the Council expects applicants to put in a Design & Access Statement, required with all full and outline applications, and applications for listed building and conservation area consent. The Council has established an external 'design review panel' consisting of a number of design professionals who provide expert advice on the quality of architecture and urban design on large scale proposals. The document gives

⁸ Canada Water Site A Environmental Statement, August 2009, Barratt Homes and BL Canada Quays Limited

⁹ Canada Water Master plan concept proposals, November 2009, Benoy

guidance for developers, architects and householders on what to include in a design and access statement including aspects of the proposal including use, layout and scale.

Study of residential density within the London Borough of Southwark, Southwark Council, January 2005

2.106 The Study of residential density within the London Borough of Southwark (CDH18) identifies and defines density characteristics within the borough. The council placed a first draft revised Unitary Development Plan on deposit in November 2002. This document included density designations on the proposals map. The purpose of this research is to review those designations in terms of local characteristics. This will be achieved by considering the urban grain and scale of development across the borough. The findings of this study will be used to inform consideration of existing policy and designations and their further development where necessary.

2.107 Designating areas of the borough with a specific residential density standard is intended to inform developers and the public as to what is expected and considered reasonable in a particular area of the borough. There is a wide variation in the character, density and accessibility across many parts of the borough. Therefore, it is important that development is appropriate to the local context, but that at the same time densities are maximised to meet the challenging housing targets, regeneration and wealth generation objectives for the borough.

Housing Background Paper Three – Density, Southwark Council, January 2010

2.108 The purpose of this study was to identify and define density characteristics within the London Borough of Southwark.

2.109 There is a wide variation in the character, density and accessibility across many parts of the borough. The results of the study support the new core strategy designations for the central, urban and suburban zones. The study used site visits, density analysis, open space analysis and consideration of levels of accessibility to determine whether areas of the borough had the correct density designations. By assessing factors such as the character, PTAL and amount of open space, appropriate density designations were set out for different part so the borough (the Northern Sample Area, Middle Sample Area, Southern Sample Area and the Suburban Zone). Taking all of the data into consideration, the main change recommendation of the study was that the Northern sample area (Canada Water and Rotherhithe) would be

more appropriate within the definition of 'suburban' in the London Plan than 'urban'.

3. THE STRATEGY

Background

- 3.1 Section 1, page 10 of the publication draft core strategy sets out the important issues for tall buildings of:
- What different places in the borough, such as Elephant and Castle, Bankside, London Bridge, Peckham, Canada Water and Aylesbury will be like in the future
 - How we will facilitate regeneration and improvements
- 3.2 Section 1, page 23 of the publication draft core strategy sets out the main challenges that we need to tackle and opportunities that we need to take to achieve our vision of improving our places for our diverse population between 2009 and 2026. The key ones for tall buildings are to:
- Achieve 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 to provide successful town centres, jobs and places for businesses to thrive. Southwark has huge differences between the wealthy and the more deprived areas despite being one of the largest economies in England
 - Protect historic areas and make sure open spaces are cared for and used
 - Make sure the design of developments is carefully thought through to contribute to successful places for people.
 - Protect the suburban character of Rotherhithe and the south of the borough.
 - Work with Lambeth, Lewisham, Tower Hamlets, Bromley, Westminster, City and Croydon to make sure our growth and opportunity areas complement each other.
 - Work 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.
- 3.3 Section 3, page 28 of the draft publication core strategy sets out our vision. The vision for Southwark is to make sure that this regeneration is as sustainable as possible by setting high environmental and design standards along with protecting and improving a network of open space and heritage throughout the borough.
- 3.4 Section 3, page 29 of the draft publication core strategy sets out our themes and objectives to achieve our vision and the priorities in the community strategy. The key ones for tall buildings are:
- Theme 1: Improving individual life chances
 - Theme 2: Making the borough a better place for people

3.5 Section 3, pages 30 to 32 of the draft publication core strategy sets out these themes to ensure integration with our other corporate plans and strategies. We compared the core strategy themes and objectives with the sustainability objectives of the sustainability appraisal. Within the themes we set a number of strategic objectives that cover tall buildings:

- Strategic Objective 1E. Be safe: Southwark will be a safe place for people to live, visit and work. The policies related to this theme are STP1, STP2, SP1, SP4, SP12 and SP14.
- Strategic Objective 2B: Promote sustainable use of resources. Southwark will be a green and environmentally sustainable borough. New developments will be built to high environmental standards to reduce the impact on the environment and adapt to climate change, focussing on flood risk, waste management, biodiversity and water quality. New housing and businesses will be located near to community facilities, shops, offices and leisure facilities. This encourages walking, cycling and public transport and reduces the need to travel.
- Strategic Objective 2C: Provide more and better homes. The whole of the borough will offer more housing of a range of different types to meet the needs of the community. All the housing will be built to a high quality of design. There will be a choice of housing types including more family housing, housing for students and more affordable housing.
- Strategic Objective 2F: Conserve and protect historic and natural places Southwark's historic buildings will be protected and improved particularly in conservation areas. Open spaces and biodiversity will be protected, made more accessible and improved.

Policy 12 – Design and Conservation

Opportunity Areas

3.6 We consider that appropriate locations where tall buildings could go are in the Bankside, Borough and London Bridge and Elephant and Castle opportunity areas.

Action Areas

3.7 We consider that appropriate locations where tall buildings could go are in the Aylesbury, Canada Water and Peckham and Nunhead action area cores.

Rest of the borough

3.8 We will consider whether tall buildings are appropriate in other parts of the borough by carrying out urban design analysis.

Issues and options

3.9 In the Core Strategy issues and options paper we suggested keeping the strategic approach to the location of tall buildings and consulted on

the existing Southwark Plan (CDL1) Policy 3.20 that planning applications may be granted for tall buildings on sites which have excellent accessibility to public transport, are located in Central Activities Zone (particularly in opportunity areas) outside landmark viewing corridors and the criteria that tall buildings should meet to be appropriate.

- 3.10 The key comments raised during consultation regarding the location of tall buildings are:
- Necessary to review the UDP approach to tall building strategy to respond to the chosen growth option.
 - That policy 3.20 did not meet GLA or CABE guidance.
 - That policy 3.20 be assessed on a site by site basis.
 - That policy 3.20 does not provide a clear steer regarding the location of tall buildings and is not being consistently implemented across the borough and concern over the use of the use of the location of landmark significance.
 - That policy 3.20 only allows tall buildings in the CAZ.
 - Consider the wider impact on Lambeth.
 - That high rises attract anti-social behaviour.

Preferred option

- 3.11 The Core Strategy preferred option which was taken forward was for regenerating places by creating Growth Areas at the Central Activity Zone, Elephant and Castle, Peckham, Canada Water, Bankside, London Bridge and Camberwell.
- 3.12 The changes to our strategic approach to the locations of tall buildings, which was informed by the comments from issues and options consultation, include:
- We reviewed the UDP approach to locations for tall buildings and set out where in the borough they would be allowed. Further detail on the appropriate locations for tall buildings will be looked at in more detail in the preparation of Action Area Plans, Supplementary Planning Documents and Development Management Development Plan Documents.
 - That tall buildings will be encouraged in the right locations in the opportunity areas and cores action areas and these locations are set out on our proposals map.
- 3.13 In the Core Strategy preferred options paper we consulted on the following:
- Encouraging tall buildings in the right locations in the opportunity and core action areas where they make a positive contribution to regeneration and have exceptional design quality. These areas are shown in our proposals map in appendix A.

- The Core Strategy Draft Proposals Map indicated a Tall Building Zone that included Blackfriars Road north and London Bridge areas.
 - Not allowing tall buildings in the rest of Southwark.
- 3.14 The key comments raised during consultation regarding the location of tall buildings are:
- English Heritage had concerns that the approach should include review of the wider historic context including, conservation areas, LVMF, World Heritage Sites, local views, highlighting the need for a borough evidence study which supports the approach to tall buildings, sensitivities and why they are not suitable in the rest of the borough.
 - English Heritage also consider that 'We are doing this because' needs to acknowledge the development pressures faced in the Borough due to housing and employment targets etc.
 - That the policy should clearly reference the London Plan and Mayor' strategies.
 - That other parts of Borough and Bankside could be considered apart from northern end of Blackfriars Road.
 - That tall buildings should not be encouraged in the borough at all and that we adopt a policy to discourage tall buildings.
 - Clarification of the design criteria and rationalise the text regarding the design quality expected.
 - Innovative design of tall buildings could allow them to be suitable in Conservation Areas.
 - That parts of Canada Water Growth Area should be considered as appropriate for tall buildings.

Strategy for tall buildings

- 3.15 Our strategy for tall buildings is that we require these developments to be of the highest possible standard of design and to make a positive contribution to regenerating areas and to create unique places while ensuring that new development preserves or enhances the significance of the historic environment and heritage assets and their settings, in accordance with Planning Policy Guidance (PPG) 15 and 16 (CDN10 and CDN11), recently superseded by Planning Policy Statement (PPS) 5 :
- 3.16 The Core Strategy identifies appropriate locations where tall buildings could go are in London Bridge, the northern end of Blackfriars Road, Elephant and Castle and action area cores.
- 3.17 We have decided this because of the findings from the Core Strategy: Borough-wide Tall Building Research Paper (CDD1), and this process has been informed by the findings from both the Issues and Options and Preferred Options stages of consultation.

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- 3.18 The Borough-wide Tall Building Research Paper (CDD1) has established that tall building development would be more suitable in the following locations:
- Bankside, Borough and London Bridge Opportunity Area
 - Elephant and Castle Opportunity Area
 - Peckham and Nunhead Action Area core
 - Aylesbury Action Area core
 - Canada Water Action Area core
- 3.19 Tall buildings would be suitable in these locations because they meet the considerations reflect those indicated in the Southwark Plan (CDL1) Policy 3.20 and draft replacement London Plan (CDR2) Policy 7.7 which provide considerations that ensure that tall buildings are located in the right place.
- 3.20 These locations provide 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.
 - Which can emphasise a 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.
- 3.21 Tall buildings would not be appropriate in other areas as they do not meet the above considerations. Generally these areas would be characterised as:
- Not located within the Central Activity Zone or action area cores and where we would not expect high density development.
 - Not located within close proximity to a major transport hub and numbers of additional users would create increased pressure on the public transport networks in the area.
 - Not at locations which would emphasise a point of civic or visual significance and tall buildings would likely be out of character with the surrounds and would potentially prove overbearing in the area.
 - In areas where there is less opportunity for large scale development which could provide a major contribution to

enhancing the public realm or the improving the permeability of the area.

- Not a focus for regeneration and activity and likely provide large scale intense development which would not be suitable or possible in these locations and prove to be a negative impact in the area.
- Areas of predominantly low height development, conservation areas or protected open spaces, where tall buildings would be out of context and character with the surrounds and likely dominate or potentially repeat the mistakes of the past.

3.22 The study has also looked at the urban design considerations which are sensitivities for tall buildings and provide constraints for new development in these areas. 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

3.23 As the borough-wide study is a strategic study that identifies broad locations that could have tall buildings which based on key strategic considerations. More detailed consideration of these points are explored in the more detailed 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.

3.24 Further planning documents are being prepared or will be prepared as part of our Local Development Framework which will provide more guidance and detail on tall buildings. Some of the documents which provide additional information include:

- Core Strategy: Bankside, Borough and London Bridge Opportunity Area : Stage 1 - Tall Building Research Paper (CDD2) identifies the appropriate locations for tall buildings in the opportunity area.

- Draft Bankside, Borough and London Bridge Supplementary Planning Document (CDD3) provides more information about the specific locations where tall buildings are appropriate and the sensitivities for tall buildings within the appropriate locations for tall buildings in the opportunity area. This is supported by Character Area Appraisals (CDD32 to CDD40) which provide analysis of the local character and historic context and a Tall Building Study (CDD3) which provides detailed analysis of the urban design considerations for tall buildings in these locations and includes a views assessment and three dimensional modelling study. We have also developed a set of criteria which will be used to assess tall building proposals in the borough and will be explored in more detail in a Development Management Development Plan document:
 - 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
- Elephant and Castle Development Framework Supplementary Planning Document (CDSPD10) and Enterprise Quarter Supplementary Planning Document (CDSPD11) provide the strategy for building heights in the area.
- Draft Canada Water Action Area Plan (CDAAP2) provides more information about the appropriate height ranges for development in the action area and appropriate locations for tall buildings. Further studies will provide more detailed information on the sites identified for tall buildings including the Canada Water Site A Environmental and Design & Access Statements (CDD4) and Benoy Masterplan Concept Proposals (CDD5).
- Aylesbury Action Area Plan (CDAAP1) provides more information about the appropriate height ranges for development in the action area and appropriate locations for landmark tall buildings. A supporting Visual impact assessment (CDD6) provides additional to support the AAP document.
- Draft Peckham and Nunhead Action Area Plan (CDAAP3) which is currently at Issues and Options stage, provides possible locations for tall buildings in the action area. These locations have not been decided and further studies will be undertaken as part of the AAP.
- Conservation Area Appraisals (CDD7 to CDD31) have been prepared, are being reviewed or will be prepared for most of the areas identified and are available on the Southwark website for review.

- Study of residential density within the London Borough of Southwark (CDH18) which identifies and defines density characteristics within the borough.
- 3.25 Further to the appropriate locations for tall building developments, as identified by CABI and English Heritage guidance (CDN25) and in the consultation draft replacement London Plan (CDR2) Policy 7.7, in addition to the requirements for tall buildings 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.¹⁰

¹⁰ Recommendations for Living at Superdensity, HTA, Levitt Bernstein, PRP & Pollard Thomas Edwards, July 2007

4. IMPLEMENTATION

- 4.1 We will work with the GLA, English Heritage and CABE to prepare detailed guidance for appropriate building heights in planning documents covering each of these areas.

Implementation through working in partnership

- 4.2 The height and scale of development is an important consideration in creating attractive and distinctive places. However they need to be well designed so that they do not cause overshadowing, block views or create wind tunnels and they should help create more landscaped public spaces and enliven places.
- 4.3 We will work with the GLA, English Heritage and CABE to prepare detailed guidance for appropriate building heights in planning documents covering each of these areas. Policy 4B.9 of the London Plan (CDR1) indicates the Mayor's positive approach to the construction of tall buildings in appropriate locations and considers that boroughs should consider all applications for tall buildings against the criteria set out in London Plan policies 4B.1, 4B.3, and 4B.9.
- 4.4 Our target is to achieve excellently designed tall buildings an exemplary standard of design making a positive contribution to regenerating areas and creating unique places. buildings and schemes In order to do this 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)
 - English Heritage
 - Greater London Authority (GLA)
 - Southwark Design Review Panel.
 - Metropolitan Police
 - Business improvement districts (BIDs)
 - The voluntary and community sector.

Implementation through policy

- 4.5 We are preparing area action plans and area specific planning documents for areas where we expect most growth and change to occur. We are preparing area action plans for Aylesbury, Canada Water, Peckham and Nunhead, the Old Kent Road and Camberwell. These documents will provide more detailed policies on design and conservation. Through analysis such as urban design, transport and capacity studies these documents will identify and suitable locations for tall buildings. The adoption timetable for these is set out in our Local Development Scheme.

- 4.6 We are also preparing a supplementary planning document for Bankside, Borough and London Bridge which will provide more detailed policies on design and conservation. The adoption timetable for this is set out in our Local Development Scheme. The document will set out sites which are suitable for tall building development and will provide more detailed guidance for individual sites. This is also done through some of our existing supplementary planning documents/guidance including those for the Elephant and Castle area.
- 4.7 We require 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.

Implementation through development management

- 4.8 We have a number of ways in which we can ensure that all new applications for tall buildings are of a high standard of design and incorporate inclusive design for accessibility. We have prepared a Residential Design Standards SPD (CDSPD8) and Design and Access SPD (CDSPD9). We will be preparing a housing development plan document (DPD) and a development management DPD to provide further policies and guidance. This will review the existing residential design standards SPD to provide more detailed information on the strategic density policy. It will set out criteria for exemplary design.
- 4.9 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. We currently have 40 conservation areas covering 686ha (23% of the borough) and around 2,500 listed buildings and monuments.
- 4.10 The Council has prepared or plan to prepare conservation area appraisals for most of these areas. 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 Planning Policy Guidance (PPG) 15 and 16 (CDN10 and CDN11) now superseded by PPS 5.

Implementation through evidence-based strategies

4.11 We can implement our approach through design standards, studies and tools, some of which form part of our evidence base. This includes

- English Heritage and CABE guidance on tall a building, which has been endorsed by the Government. This advises that in the right place tall buildings can make positive contributions to places.
- Following the English Heritage guidance on Historic Landscape Assessments
- Working closely with CABE, Building for Life and other local authorities to towards our target achieving an increasing number of developments securing Building for Life Awards.
- Working closely with the Metropolitan police and developers towards our target to achieve our target is to increase the number of schemes achieving a Secured By Design award.
- The Council commissioned 3D modelling studies to be carried out for tall building locations for Borough, Bankside, London Bridge and Elephant and Castle.
- Working closely the Registered Social Landlords and the Government to ensure to ensure that all social housing meets Decent Home Standards.

5. CONFORMITY WITH THE LONDON PLAN

- 5.1 The strategy is in general conformity with the London Plan (CDR1) policies:
- Policy 4B.9, by identifying that there could be suitable locations for tall buildings in the Central Activity Zone and Opportunity Areas. We have identified areas of specific character that could be sensitive to tall buildings in our Core Strategy: Borough-wide Tall Building Research Paper.
 - Policy 4B.10 as we are saving Policy 3.20 of the Southwark Plan (CDL1) which sets out the aspirations and a set of criteria for considering the design of tall buildings.
 - Policy 4B.16 to 4B.18 as we are saving Policy 3.21 of the Southwark Plan (CDL1) and the Core Strategy: Borough-wide Tall Building Research Paper (CDD1) which acknowledge the strategically important views and how development in these views will be tested.
- 5.2 The strategy is in general conformity with the consultation draft replacement London Plan (CDR2) policies:
- Policy 7.7 by ensuring that “tall and large buildings are part of our strategic approach to changing or developing an area and that they should not have an “unacceptable harmful impact on their surrounds” (policy 7.7, paragraph A). As set out in paragraph C we have identified suitable locations for tall buildings in the Central Activity Zone, Opportunity Areas and Action Area cores and that we are saving Policy 3.20 of the Southwark Plan (CDL1) which sets out the aspirations for the design of tall buildings and Policy 3.21 which acknowledges the strategically important views and how development will be tested. We have also identified areas that could be sensitive to tall buildings in our Core Strategy: Borough-wide Tall Building Research Paper (CDD1).
 - Policy 7.10 and 7.11 as we are saving Policy 3.21 of the Southwark Plan (CDL1) and have identified in the Core Strategy: Borough-wide Tall Building Research Paper (CDD1) that development should not have a negative impact on the setting of the World Heritage Sites and also acknowledges the strategically important views and how development in these views will be tested.

6. SAVED POLICIES

6.1 Policy 12 in the core strategy provides a strategic approach by locating tall buildings in opportunity areas and core action areas where there will be regeneration and growth in accessible areas. Most of policy 3.20 is being saved in the Southwark plan to provide a criteria based approach to considering development. The criteria for considering tall buildings will be replaced in the development management development plan document. Further local considerations may require further criteria and strategies in area action plans and supplementary planning documents.

6.2 This strategic approach in policy 12 in the core strategy replaces the sentence in policy 3.20 of the Southwark plan as follows:

Planning permission may be granted for buildings that are significantly taller than their surroundings or have a significant impact on the skyline, on sites which have excellent accessibility to public transport facilities ~~and are located in the Central Activities Zone (particularly in Opportunity Areas) outside landmark viewing corridors. Proposals for tall buildings should ensure that there are excellent links between the building(s) and public transport services.~~

6.3 This is to move towards the strategy of growth areas, and to reflect the new action areas and their cores and the enlarged Bankside, Borough and London Bridge opportunity area rather than focusing tall buildings in the entire Central Activities Zone outside landmark viewing corridors. The issue around links is covered in the more detailed design policy 3.12 and 3.13 and will be saved until the development management development plan document. Further local considerations may require further criteria and strategies in area action plans and supplementary planning documents.

7. DOCUMENT REFERENCES

National

- CDN1. Planning Policy Statement 1: Delivering Sustainable Development, Communities and Local Government, January 2005
- CDN45. Planning Policy Statement 6: Planning for Town Centres, Communities and Local Government, March 2005
- CDN9. Planning Policy Statement 13: Transport, Communities and Local Government, April 2001
- CDN10. Planning Policy Guidance 15: Planning and the Historic Environment, Communities and Local Government, September 1994
- CDN11. Planning Policy Guidance 16: Archaeology and Planning Communities and Local Government, November 1990
- CDN25. Guidance on Tall Buildings, CABE & English Heritage, July 2007
- CDN26. Understanding Place: Historic Characterisation For Planning And Development Draft Document, English Heritage, July 2009
- CDN27. By Design – Urban Design in the planning system: towards better practice DETR/CABE, 2000
- CDN28. Recommendation for living at Superdensity Design for Homes, July 2007
- CDN103. Planning Policy Statement 5 – Planning for the Historic Environment, Communities and Local Government, March 2010

Regional

- CDR1. The London Plan Spatial Development Strategy for Greater London, Mayor of London, Consolidated with alterations February 2008
- CDR2. The London Plan, Spatial Development Strategy for Greater London, Consultation draft replacement plan Mayor of London, October 2009

- CDR42. London View Management Framework, The London Plan Supplementary Planning Guidance, Mayor of London, July 2007
- CDR6. Mayors Housing Supplementary Guidance, Mayor of London, 2005
- CDR7. Mayors Draft Revised Interim Housing Supplementary Guidance, Mayor of London, October 2009
- CDR13. Draft Revised Supplementary Planning Guidance, London View Management Framework, Mayor of London, May 2009
- CDR29. Draft City Fringe Opportunity Area Framework, Mayor of London, February 2008
- CDR50. Recommendation for living at Superdensity, Design for Homes, July 2007
- CDR49. Building for Life, CABE, November 2008

Local

- CDL1. Southwark Plan, The Framework for all Land Use and Development in Southwark, Southwark Council, February 2006
- CDL2. Southwark 2016, Sustainable Community Strategy, Our shared vision for the future, Southwark Council & Southwark Alliance, December 2006
- CDH18. Study of residential density within the London Borough of Southwark, Southwark Council, January 2005
- CDB4. Housing Background Paper Three – Density, Southwark Council, January 2010
- CDAAP2. Draft Canada Water Area Action Plan Submission/Publication Report, Southwark Council, January 2010
- CDD4. Canada Water Site A Environmental Statement, Barratt Homes and British Land Canada Quays Limited, August 2009
- CDD5. Canada Water Masterplan concept proposals, Benoy, November 2009

- CDAAP3. Draft Peckham & Nunhead Area Action Plan - Stage 1: Issues & Options Report, Southwark Council, March 2009
- CDAAP1. Aylesbury Area Action Plan, Southwark Council, January 2009
- CDD6. Background paper: Visual impact assessment, Aylesbury Area Action Plan, Southwark Council, May 2009
- CDSPD8. Residential Design Supplementary Planning Document, Southwark Council, 2008
- CDSPD9. Design and Access Statement Supplementary Planning Document, Southwark Council, 2007
- CDSPD10. Elephant and Castle Development Framework Supplementary Planning Document, Southwark Council, 2008
- CDSPD11. Elephant and Castle Enterprise Quarter Supplementary Planning Document, Southwark Council, 2008
- CDSPD1. Draft Bankside Borough and London Bridge Supplementary Planning Document Southwark Council, December 2009
- CDD1. Core Strategy: Borough-wide Tall Buildings Research Paper, Southwark Council, March 2010
- CDD2. Core Strategy: Bankside, Borough and London Bridge Opportunity Area : Stage 1 - Tall Buildings Research Paper, Southwark Council, March 2010
- CDD3. Bankside, Borough and London Bridge : Stage 2 - Tall Buildings Study, Southwark Council, December 2009