

London Borough of Southwark Response

Examination of the New Southwark Plan

Inspectors' Matters, Issues and Questions

Matter 2 – Spatial Strategy Area Vision

Issue 1

Whether the Plan's Spatial Strategy and Area Vision have been positively prepared and whether they are justified, effective, consistent with national policy and in general conformity with the London Plan.

Relevant Policies – SP1a, SP1b, SP2 and AV.01 – AV.16

Strategic Vision

Question 2.1

Is the plan's vision for the borough overall justified and sufficiently clear? How has the vision for the area been informed by the Sustainability Appraisal/ IIA?

1. The strategic vision for the plan sets Southwark within the national and London context. It shows how the local strategy for Southwark will enhance and regenerate the distinct places within Southwark and how they link with central London and the wider area. It designates the Central Activities Zone, Opportunity and Action areas along with town centres, open spaces and historic and protective destinations. The area visions set out how the areas will develop during the lifetime of the plan. They translate the national and regional policy along with the local aspirations and objectives into the local strategy. These have been informed by how our residents relate to the neighbourhoods in which they live through consultation on the plan. The plan also contains a number of Key Diagrams which illustrate the spatial designations of the plan and this translation of national and regional policy at the local level along with the strategy for regeneration and development in Southwark on a strategic level.
2. The individual Vision Areas have all been appraised in the IIA using the 17 sustainability objectives including health, equality and environmental considerations. This has informed the overall strategy and the visions for the borough including strategic designations in the Publication London Plan (2020) and particularly the relationship with central London.

Development Targets and Spatial Strategy (Southwark's Places)

Question 2.2

Does the plan provide clear, positively prepared and justified development targets for the Borough?

1. Yes. Policy SP1a contains the identified development targets for the borough which have been informed by the evidence base and consultation. This is explained in the background papers/in response to specific theme based Matters. The development targets are proposed to be amended to ensure that they fall within the same 15 year plan period (see EIP161 Strategic Targets Background Paper).

Question 2.3

Are the locations identified for development, including the focus on the opportunity areas, the most appropriate locations? What alternative options were considered? What role has the IIA had in influencing the distribution of development across the 16 policy areas identified?

1. The locations identified for development including the opportunity areas are generally continuations of the adopted strategy in the Southwark Plan with amendments (2007), the Core Strategy (2011) and the adopted and Publication London Plan (2020). The locations for the Central Activities Zone and the Opportunity Areas and town centres are identified in the adopted London Plan (2016) and the Publication London Plan (2020). The purpose of the London Plan is to ensure that all of the individual plans produced by the London boroughs work together to meet the priorities that are agreed for the whole London region. The boundaries were then designated in the Southwark Plan in 2007 and continued in the Core Strategy (2011). The strategy for developing in additional or alternative areas is continuously under review as the Council discusses development opportunities and impacts with the communities as set out in the consultation report.
2. Canada Water and Old Kent Road were identified as Opportunity Areas in the London Plan (2016). Canada Water was an Action Area and so the impact was to increase the quantum of development. This Opportunity Area underwent an options analysis during preparation of the Area Action Plan and the subsequent amendments which were examined. This strategy continues the strategy set out in the AAP and updates this to take into account the current sites analysis.

3. Parts of Old Kent Road were a Strategic Preferred Industrial Location. The amendments to the London Plan (2016) set out a new strategic vision which illustrated the ambition of Southwark Council to transform the area to deliver significant regeneration. The alternative options are set out in the iterations of the informal consultation on the Old Kent Road Opportunity Area Planning Framework which has been prepared in continual consultation with the Mayor.

4. The consideration of development location and quantum follows the strategy of locating the larger and busier developments which will have significant impacts in the Central Activities Zone, Opportunity and Action area cores. Pages 5 to 7 of the Site Allocations Methodology Report (EIP82) explains how the site allocations which contain the larger quantum of development were drawn from a range of sources. The site allocations are generally over 0.25ha which is consistent with the SHLAA to identify opportunities for intensification. Appendix 1 explains which sites were discounted and the reasons they were omitted. There are 83 site allocations identified in the New Southwark Plan. Sites are identified in the four Opportunity Areas, in town centres and Action Areas as well as in other strategic locations. These areas represent the most appropriate locations to intensify the scale of development to meet pressing needs for housing and demand for other uses. Alternative options were considered in the IIA (EIP71) including 'Business as usual' and 'Higher Option' scenarios. All of the site allocations have been appraised in the IIA through the development of the NSP and this has informed the detailed site guidance developed in the allocation. The 16 vision areas have also been appraised which has informed the distribution of development across the areas, including identifying sites for particular uses in particular locations. The NSP allocates specific deliverable sites for the 15 year plan period in order to identify sufficient land for the delivery of homes, as well as other strategic objectives including accommodating demand for offices and retail in the CAZ and town centres. The Publication London Plan (2020) designates overall indicative development capacity for Opportunity Areas and the NSP identifies sites to meet the strategic objectives of these areas.

General Area Vision Questions

Question 2.4

For each of the 16 individual area vision (AV) policies in the Plan, is the basis for the strategy for that area clear, positively prepared, justified and in general conformity with the London Plan (including the opportunity areas)?

1. The 16 vision areas have been informed by how our residents relate to the neighbourhoods in which they live through consultation on the plan to date. They are also informed by the aspirations of future development including through Opportunity or Action Area designation, town centre boundaries and availability of land for development. There has been extensive consultation through the NSP on the visions and vision areas which have been positively prepared and they are justified by identifying the available development sites and Opportunity Areas in the Publication London Plan (2020).

Question 2.5

Are the individual area vision policies sufficiently clear as to the overall scale of development envisaged over the plan period and how this will be delivered, including what needs to be delivered through allocations in the NSP, through policies and allocations in Area Action Plans and where appropriate through Neighbourhood Plans?

1. The site allocations specify the scale of development envisaged and Table 1B in Policy SP1b sets out the scale of development as a total of all the site allocations within each Vision Area.
2. Delivery of the visions is set out in site allocations. The 5 and 15 Year Housing Land Supply sets out the delivery of homes for the whole borough, this includes all of the sites that we would expect to deliver the quantum of development in Southwark. The site allocations in the NSP will deliver the Development Plan quantum of development. We are updating the 5 and 15 Year Housing Land Supply and the site allocations methodology paper to clarify the site allocations along with pipeline and completions.

Specific Area Vision Questions

Policy AV.01 – Aylesbury Area Vision

Question 2.6

The vision refers to a figure of 4,200 homes to be delivered in the area through the 2010 Area Action Plan. What is the current situation in terms of the timeline for regeneration at Aylesbury; what has been delivered in the Aylesbury area out of the 4,200 homes and what remains to be delivered? Are the figures net given the existing housing stock to be replaced? Annex 2, Table 3 (detail to the housing trajectory) shows 1,063 dwellings in the pipeline in the Aylesbury AAP area including sites under construction. How does these sites relate to the AAP sites in the Vision Map and are they part of the 4,200?

1. In total, more than 4,200 new homes will be built (replacing around 2,700 original homes). There will be a net increase of 1,500 homes. The Housing Trajectory on page 31 of the Plan sets out the delivery of homes in the Aylesbury AAP, these are based on the 5 and 15 Year Housing Land Supply which provide the net figures.
2. As set out in Q1.3 the housing supply should be modified from the basis of 1 April 2020. This requires updates to the 5 and 15 Year Housing Land Supply Report, the Site Allocations Methodology Report and the Housing Trajectory in the plan to reflect the updated supply and timeframes for delivery which are being undertaken.
3. The latest figures, as of January 2021 as set out in the Aylesbury Update January 2021 (EIP158) 400 new homes have been built (delivered by London and Quadrant) and a further 351 homes are now under construction on two sites. 229 of these will be council homes and should be ready by the end of 2021.
4. We are also about to start building a further 352 new council homes which will be ready in 2024.
5. Yes, the 1,063 dwellings in the pipeline are to be delivered on the sites within the Vision Map.
6. The Plan includes an area vision for Aylesbury, the Area Action Plan site allocations identified in the vision map – as a factual update to the Plan, the AAP1, AAP2, AAP3 and AAP4 site allocations should be inserted into the Plan to provide further guidance on any developments coming forward on the sites. The site allocations can be provided as main modifications to the plan. We have provided a draft site allocation as part of the update to the site allocations methodology paper to clarify the requirement in the NSP.

Question 2.7

To what extent is the NSP Area Vision, as the more up-to-date policy, consistent with the 2010 AAP in delivering sustainable development in this part of the Borough? Is the Aylesbury Vision Area in the NSP coterminous with the AAP boundary?

1. The NSP Area Vision will supersede the Aylesbury Area Action Plan vision as the most up to date Plan. The NSP vision sets out how sustainable development will be delivered in this part of the borough. The vision in the NSP covers the same area as the AAP wider boundary. We have provided a draft site allocation as part of the update to the site allocations methodology paper to clarify the requirement in the NSP.

Policy AV.02 – Bankside and the Borough Area Vision

Question 2.8

Is the policy sufficiently clear as to the role of the Southbank and Waterloo Neighbourhood Plan having regard to the fact that the Local Plan would, on adoption, become the more up to date document? Are there any other impacts on the Neighbourhood Plan?

1. The Vision confirms that any development coming forward in the area should consider the Southbank and Waterloo Neighbourhood Plan. The Neighbourhood Plan forms part of the Development Plan as set out in the Local Development Scheme.

Question 2.9

Does it accord with both the principles and requirements for the London Bridge and Bankside Opportunity Area as set out in the London Plan?

1. Yes, the Area Vision is in general conformity with the Publication London Plan (2020) which seeks to deliver new homes and jobs in the Opportunity Area Table 2.1 - London Bridge/Bankside. The indicative capacity is for 4,000 homes (2019 to 2041) and 5,500 jobs (2017 to 2041). Annex 2 sets out the housing trajectory for Bankside and Borough, Blackfriars Road and London Bridge Vision Areas which comprises 3,184 homes through site allocations, however, this is only planned up to 2033. This does not include other approved planning applications or windfall sites to be delivered in the Opportunity Area. The site allocations in the Central Activities Zone are expected to deliver an uplift in office floorspace and this will contribute to the overall office jobs target and we will meet the expectation of the Publication London Plan (2020).

Policy AV.04 - Blackfriars Road Area Vision

Question 2.10

Is the approach to tall buildings at the north end of Blackfriars Road consistent with NSP Policy P16 and the London View Management Framework?

1. Yes. The approach to tall buildings at the northern end of Blackfriars Road is consistent with NSP P16 and the London View Management Framework.
2. P16 of New Southwark Plan page 104 (EIP27A) sets out:
 6. *The riverfront areas of Blackfriars Road, Bankside and London Bridge provide an established height for tall building clusters set back from the river with a number of prominent buildings visible on the skyline including*

One Blackfriars Road, Southbank Tower, Tate Modern and its extension, Guy's Hospital Tower, London Bridge Place, and the Shard. The Shard which stands at 309.6m, 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.

3. The London View Management Framework (LMVF) sets out a series of designated views across London. The designated view geometry within the Framework does not criss-cross the northern end of Blackfriars Road. As such, this location is consistent with the London View Management Framework.
4. Both the Blackfriars Road SPD (EIP34) and the Core Strategy 2011 (EIP68) have established this location as an appropriate location for tall buildings. SPD 5 paragraph 3.5 of the Blackfriars Road SPD (EIP34) sets out: “... *At the north end of Blackfriars Road taller heights would provide further definition to the emerging cluster of tall buildings around Stamford Street, Southwark Street and the junction with Blackfriars Road.*”
5. Recently, a number of tall buildings have been constructed and consented at this identified tall building location in the line with the extant development plan.

Policy AV.08 – East Dulwich Area Vision

Question 2.11

Does the vision adequately reflect the proposed allocation for Dulwich Hamlet Football Club?

1. Yes, the Vision supports the provision of an improved stadium for Dulwich Hamlet Football Club and NSP37 requires redevelopment of the site to retain or reprovide the football club and ancillary facilities and sports facilities (D2). Both the Vision and the Site Allocation support the provision of housing.

Policy AV.09 – Elephant and Castle Area Vision

Question 2.12

Does the Area Vision appropriately reflect the status and implications of Elephant & Castle being identified in the Intend to Publish London Plan (2019) as an opportunity area with an indicative capacity for 5,000 homes and 10,000 jobs? To what extent is existing regeneration likely to contribute to development targets having regard to the figures in Policy SP1b? Is the plan reliant on further phases of regeneration to sustain delivery in Elephant and Castle during the plan period?

1. Yes, the Area Vision is in general conformity with the Publication London Plan (2020) which seeks to delivery new homes and jobs in the Opportunity Area Table 2.1 - Elephant and Castle - indicative capacity for 5,000 homes (2019 to 2041) and 10,000 jobs (2017 to 2041). Annex 2 sets out the housing trajectory for 1,915 homes through site allocations in Elephant and Castle and Walworth vision areas. Through the Heygate Masterplan a significant number of homes have been delivered or are in the pipeline comprising 1,222 homes (set out in Annex 2). The delivery for the area is only planned up to 2033 and does not include other approved planning applications or windfall sites to be delivered in the Opportunity Area.
2. The site allocations in Elephant and Castle and Walworth are estimated to deliver 109,018sqm gross of employment, retail, leisure, education and community uses. Whilst some jobs already exist on some of the sites, it is anticipated that the significant regeneration opportunities would deliver additional jobs in the completed developments generating around 4,000-5,000 jobs. In addition, the Elephant Park redevelopment is estimated to generate 5,000 jobs in construction as well as 1,000 jobs in the completed development. The council partnered with Lendlease in 2016 to commission the Southwark Construction Skills Centre at Elephant and Castle, which supports residents to access pre-employment training, gain employment and progress in their careers by up-skilling. The centre supports developers to fulfil their section 106 employment and skills obligations on sites across the borough, offering a site for engaging local people with the construction industry and providing residents with the skills they need to enter and progress in the sector. Since July 2016 over 4,000 Southwark residents have received training at the centre.

AV.11 – London Bridge Area Vision

Question 2.13

Is the vision consistent with NSP Policy P16 and the evidence base in relation to tall buildings, particularly in regards to the Shard?

1. Yes. The vision for London Bridge is consistent with NSP P16 and the evidence base at this established location for tall buildings. The requirement for the Shard, located above London Bridge Station, to remain the tallest building with an emerging cluster with future tall buildings stepping down in height around the Shard at appropriate locations, is consistent with the criteria set out in P16.

Policy AV.13 – Old Kent Road Area Vision

Question 2.14

Does the Area Vision, in combination with Policies SP1a and SP1b provide a justified and effective planning framework to coordinate investment and intervention to maximise the delivery of housing and the intensification of employment in the Old Kent Road opportunity area in a way which would be in general conformity with the London Plan?

1. Yes. The Publication London Plan (2020) sets out that the Old Kent Road Opportunity Area should be able to deliver 12,000 homes and 5,000 jobs. As a result of the detailed masterplan and preparation of the AAP the Old Kent Road could exceed the target set out by the Publication London Plan (2020) and achieve the delivery of 20,000 homes and 10,000 jobs over a 20 year period. The Publication London Plan (2020) includes the ambition for the Bakerloo Line extension to unlock growth and supports the co-location of housing with industrial uses and a range of commercial uses within designated town centres. The NSP Area Vision and the capacity estimates in Policy SP1b support the Publication London Plan (2020). The growth of housing significantly contributes to the targets in Policy SP1a.
2. Continuous masterplanning work, which takes into account planning applications and various constraints, has been undertaken for site specific allocations to come to the capacity as various iterations of the AAP have been published. The latest draft of the Old Kent Road AAP (December 2020) confirms the latest capacity estimates for the Old Kent Road site allocations. These capacities could be updated in the NSP as it is currently presented as a range as masterplanning work was still ongoing. The majority of sites will achieve the higher range of housing capacity, except Mandela Way (NSP55) which has introduced more industrial uses in the latest masterplan. Table 1B of Policy SP1b in the NSP identifies the capacity within the Old Kent Road area to achieve 20,000 homes. In the Strategic Targets Background Paper, Table 1B has been updated to reflect the latest figures for non-residential floorspace. The intensification of industrial land as part of the South Bermondsey masterplan and changes to other parts of the masterplan has significantly increased the anticipated net gain in employment uses in the opportunity area.
3. The site allocations within the Old Kent Road will be intensified for mixed use development and industrial co-location. Development will include an innovative new approach to create new town centres which include community facilities, retail, office, education and health uses. Industrial development will be included alongside or underneath new homes with specific design criteria to ensure businesses can operate successfully without harming residential amenity.

Question 2.15

Table 3 in Annex 2 of the NSP shows that a significant number of planning permissions have been granted on parts of allocated sites in the Old Kent Road Opportunity Area and a number of those sites are now under construction. What are the respective roles of the NSP and Old Kent Road Area Action Plan in co-ordinating growth at this strategic location for London and this is suitably clear in the NSP? In terms of phasing linked to the proposed Bakerloo Line Extension and improvements to the wider transport network capacity, how much of the quantum in a 'phase 1' for Old Kent Road has already been approved? Is there flexibility for 'phase 2' sites/capacity were the proposed Bakerloo Line Extension delayed?

1. We have prepared a joint response with TFL to this Question and this is uploaded separately.

Issue 2

As part of the spatial strategy for the Borough, will the plan deliver sustainable regeneration that will be 'successful' for both existing and future residents, businesses and community services and spaces?

Policy SP2 – Regeneration for All

Question 2.16

Are there local areas for regeneration in Southwark to which Policy SP2 is specifically aimed at? Is the focus for regeneration in Borough broadly aligned with the London Plan opportunity areas, the strategic areas for regeneration (based on indices of deprivation) identified in the Intend to Publish London Plan 2019 or is it broader?

LBS response

1. Policy SP2 is aimed at all development in Southwark rather than at the regeneration areas. The boroughwide approach to how we are taking into account communities who currently live in our regeneration areas to ensure that they are part of the change. This is implemented through the draft SCI and Development Consultation Charter. The Area Visions in the Plan and the site allocations identify where regeneration is planned. The regeneration areas are linked to the Strategic Areas for Regeneration (Rotherhithe, Old Kent Road, Elephant and Castle, Aylesbury) in the Publication London Plan (2020). They broadly align with the opportunity areas (Bankside, Borough and London Bridge Opportunity Area, Elephant and Castle Opportunity Area, Canada Water Action Area, Aylesbury Action Area).

Question 2.17

Will the policy be effective in securing sustainable regeneration in Southwark (social, economic and environmental), in a way which ensures existing communities, including businesses and community infrastructure, retain access to affordable accommodation, especially in fast changing areas of the Borough, consistent with paragraph 93 of the NPPF and PPG para 53-006-20190722? What is the role of social regeneration charters and is this appropriately reflected in Policy SP2?

1. Yes, Policy SP2 Regeneration for all and other policies in the plan will deliver sustainable regeneration in the borough and ensure existing communities, including businesses and community infrastructure, retain access to affordable accommodation. Wider policies of the Plan require the provision of affordable housing and affordable workspace in developments coming forward.
2. Consistent with Paragraph 93 of the NPPF and PPG para 53-006-20190722 , we have used our planning powers to deliver estate regeneration to a high standard.
3. Paragraph 93 of the NPPF sets out:

“Planning policies and decisions should consider the social, economic and environmental benefits of estate regeneration. Local planning authorities should use their planning powers to help deliver estate regeneration to a high standard.”
4. Strategic Policy SP2 Regeneration for all sets out a strategy for regeneration to ensure everyone can access the benefits of regeneration, in compliance with the NPPF paragraph 93.
5. PPG paragraphs 53-0006-20190722 sets out:

“Plan-making can play a crucial role in estate regeneration by setting a strategic vision and framework and establishing the principles to inform development early in the process. It is particularly important that planning policies consider the need for estate regeneration and involve communities in their production, to help build a shared understanding of the issues and opportunities in each place.”
6. It is important the NSP be read as a whole. Policy SP2 Regeneration for All sets out a strategy for regeneration for Southwark. Regeneration that works for all is wider commitment by Southwark Council to ensure that regeneration delivers benefits for all local people. This includes Estate Regeneration. Social regeneration is the process by which LB Southwark will make sure the health and wellbeing of all of our residents is the priority of regeneration.

7. Social regeneration is when areas of our borough are positively transformed so that regeneration works for all. This includes the building new affordable and social rented homes, affordable workspaces, new schools and new transport links, protecting current and creating new green spaces and creating good employment opportunities for local people. These are all objectives that policies in the NSP collectively will aim to deliver.
8. A ballot is also now required for any new estate regeneration as set out in the Great Estates Programme as agreed at Cabinet in December 2018 in the Great Estates Programme Vision and Approach (EIP155a and EIP155b).
9. There is a Council Plan commitment that commits us to guarantee developments on council housing land have at least 50% council rented homes and ensure a right to return for council tenants and resident leaseholders so local people can stay in the borough they call home.
10. The Council has considered the social, economic and environmental benefits of estate regeneration, and regeneration more widely to ensure it delivers the best outcomes for local residents.
11. Social Regeneration Charters are charters that set out the aims for reducing, social, economic and health inequalities in each area. They will also explain how we will monitor our progress towards achieving the promises the council has made to the community to reduce inequalities.
12. Social Regeneration Charters are a corporate council initiative to set out how each area in the borough can be improved to reduce health inequalities. Social Regeneration Charters are developed with local residents to ensure these are place specific and address local issues.
13. The purpose of Social Regeneration Charters is set out in the reasons of SP2 Regeneration for all. The strategy set out in SP2 Regeneration for all will contribute to resolving inequalities and improving access to the benefits of regeneration, as set out in the Social Regeneration Charters.
14. We are in the process of updating our Statement of Community Involvement which will set out how we will consult in plan making and in planning applications. We have also introduced the Development Consultation Charter to hold developers responsible for consulting residents on planning applications and ensure they accurately and honestly report on the comments received and how these have been addressed in and shaped the proposed development. Social Regeneration Charters are made reference to in this Statement of Community Involvement.

Question 2.18

Does the Plan, including Policy SP2, provide sufficient safeguards to ensure that regeneration respects the character and heritage of the Borough?

1. Yes. The Plan provides sufficient safeguards to ensure that regeneration respects the distinct character and heritage of the Borough.

2. Southwark has a significant number of heritage assets, including listed buildings and conservation areas, and valued areas of character. In order for appropriate development to occur, the New Southwark Plan, has suite of design and heritage policies that in combination with other development plan documents (London Plan, AAPs), planning guidance (SPDs, SPGs) and evidence base studies (Conservation Area Appraisals, Characterisation Studies), provide a clear policy framework for safeguarding character and heritage while delivering other strategic planning objectives, such as housing delivery targets. The suite of New Southwark Plan Policies include:
 - P12 - design of places
 - P16 – tall buildings
 - P18 - listed buildings and structures
 - P19- conservation areas
 - P20 – conservation of the historic environment and natural heritage
 - P22 – archaeology
 - P23 – world heritage sites
 - P24 – river Thames
 - P25 – local list
 - P31 – small shops
 - P33 – railway arches
 - P38 – shop fronts
 - P40 – hotels and other visitor accommodation
 - P41 – pubs
 - P42 – outdoor advertisements and signage
 - P43 – broadband and digital infrastructure
 - P56 – open space
 - P57 – open water space
 - P60 – trees
 - P65 – reducing noise pollution and enhancing soundscapes
 - IP4 – enforcement against unlawful development

3. Furthermore, Page 11 of the New Southwark Plan and subsequent section of area visions (from page 14) highlights the importance of the character of our neighborhoods. It is inevitable that new development will occur in the borough and

this will bring changes to the built form. Some of our places with poor character will improve, while areas with good character will sensitively managed with new development