

**Cabinet: 28 January 2014**  
**Blackfriars Road Supplementary Planning Document**

No.	Title	Held at
Appendix A	Blackfriars Road supplementary planning document, 2014	Hard copy provided with the report
Appendix B	Representations received and the officer comments (Appendix J of the consultation report)	Available on the web at: <a href="http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=4554&amp;Ver=4">http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=4554&amp;Ver=4</a>
Appendix C	Tracked changed version of the Blackfriars Road supplementary planning document, 2014	Available on the web at: <a href="http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=4554&amp;Ver=4">http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=4554&amp;Ver=4</a>
Appendix D	Consultation report including a separate document containing appendices A-I Two separate documents	Available on the web at: <a href="http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=4554&amp;Ver=4">http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=4554&amp;Ver=4</a>
Appendix E	Equalities analysis	Available on the web at: <a href="http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=4554&amp;Ver=4">http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=4554&amp;Ver=4</a>
Appendix F	Sustainability appraisal	Available on the web at: <a href="http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=4554&amp;Ver=4">http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=4554&amp;Ver=4</a>
Appendix G	Sustainability statement	Available on the web at: <a href="http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=4554&amp;Ver=4">http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=4554&amp;Ver=4</a>
Appendix H	Appropriate assessment	Available on the web at: <a href="http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=4554&amp;Ver=4">http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=4554&amp;Ver=4</a>
Appendix I	Urban design study	Available on the web at: <a href="http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=4554&amp;Ver=4">http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=4554&amp;Ver=4</a>
Appendix J	Business and employment background paper	Available on the web at: <a href="http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=4554&amp;Ver=4">http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&amp;MId=4554&amp;Ver=4</a>



# **Blackfriars Road Supplementary Planning Document (SPD)**

## **Consultation Report**

January 2014

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## Appendices

Appendices available in two separate documents: appendices A-I, and appendix J.

### Appendix A

Prescribed bodies and neighbouring boroughs

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Bankside, Borough and London Bridge Sustainability Appraisal Scoping Report mailout letter

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**Appendix F**

Draft Blackfriars Road SPD press notice

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The leaflet summarising the draft Blackfriars Road SPD

**Appendix H**

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**Appendix I**

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**Appendix J**

Representations and officer comments on the draft Blackfriars Road SPD

## **1. Introduction**

### **1.1 What is the Blackfriars Road Supplementary Planning Document (SPD)?**

- 1.1.1 Located in central London, the Blackfriars Road is a wide boulevard running south from the River Thames to historic St George's Circus, forming part of the "Blackfriars Mile", linking Elephant and Castle to the South Bank and beyond to the City. The area is being transformed by a series of new developments including the opening of an entrance to Blackfriars Station and innovative public realm schemes.
- 1.1.2 This SPD is required due to the scale of growth proposed. There is a need to ensure that the pressure for residential development is balanced with the need for a vibrant street with places for leisure and business and a pleasant environment. Development needs to take place in a coordinated way so that Blackfriars Road reaches its potential as a vibrant destination whilst regenerating the area from the river, along Blackfriars Road and onwards to Elephant and Castle. The SPD will provide a strategic framework and detailed guidance to coordinate future growth along and around the Blackfriars Road.
- 1.2.1 The SPD lies mostly within the Bankside, Borough and London Bridge Opportunity Area, which is identified in the London Plan as having the potential to provide around 25,000 jobs and a minimum of 1,900 new homes. A small part of the southern end of Blackfriars Road around St George's Circus lies within the Elephant and Castle Opportunity Area. There is already an adopted supplementary planning document/opportunity area planning framework for Elephant and Castle. The Blackfriars Road SPD will replace the guidance for the Elephant and Castle SPD/OAPF for the overlapping area.
- 1.2.2 The SPD provides further guidance to existing planning policies in the London Plan, Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and so the SPD must be read alongside our other planning documents.

### **1.2 What is this consultation report?**

- 1.2.1 This document explains the consultation that has been undertaken as part of the preparation of the SPD and how comments that individuals and organisations have made have been taken on board and how they have influenced the final SPD.
- 1.2.2 This report sets out how we have met and exceeded the requirements for consultation on supplementary planning documents.
- 1.2.3 The national requirements for consultation are set out in The Town and Country Planning (Local Planning) (England) Regulations 2012.

1.2.4 Our local requirements are set out in our Statement of Community Involvement (SCI) (2008) which sets out how the council will consult on our planning policy documents and also on planning applications. The SCI refers to a number of legal and regulatory requirements, both in terms of methods of consultation and also particular bodies that we must engage with. When the SCI was produced it was done so with regard to the Town and Country Planning (Local Development) (England) Regulations 2004 and the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008. In April 2012, both sets of regulations were replaced by the Town and Country Planning (Local Planning) (England) Regulations 2012. We have subsequently ensured that consultation on the SPD meets the requirements of the SCI and the updated regulations. More information is set out within section 4 of this report.

### **1.3 How to find your way around this document?**

1.3.1 This consultation report is structured in the following way:

- Section 1: Introduction to the Blackfriars Road SPD and this consultation report.
- Section 2: The stages of consultation we have carried out.
- Section 3: The consultation we carried out on sustainability appraisal scoping report.
- Section 4: The consultation we carried out on the draft Blackfriars Road SPD.
- Section 5: How and why we monitor our consultation.
- Appendices: We set out copies of our press notices, mail out letters for each stage, copies of our leaflet, summary notes from consultation events and the full representations and officer comments on the draft SPD. These appendices are made available as two separate documents.

### **1.4 Where to get more information**

1.4.1 The Blackfriars Road SPD and all the documents that support the SPD, including the sustainability appraisal, the equalities analysis, the appropriate assessment and the urban design study can all be viewed at our website:

[www.southwark.gov.uk/blackfrairsroadspd](http://www.southwark.gov.uk/blackfrairsroadspd)

1.4.2 Copies are also available by contacting the planning policy team at:  
Email: [planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk), telephone 020 7525 5471 or by writing to us at Planning policy, Chief Executive's Department, Southwark Council, FREEPOST SE1919/14, London SE1P 5LX

## **2. Stages of consultation**

### **2.1 What stages of consultation have been carried out?**

2.1.1 We carried out two key stages of consultation:

- Consultation on the Bankside, Borough and London Bridge sustainability appraisal scoping report from 31 October to 4 December 2012.
- Consultation on the draft Blackfriars Road SPD from 21 June to 12 September 2013.

### **2.2 What was consulted on at each stage?**

#### *Related consultation*

- 2.2.1 The area covered by the Blackfriars Road SPD falls mostly within the Bankside, Borough and London Bridge opportunity area. A draft supplementary planning document/opportunity area planning framework had been prepared previously for Bankside, Borough and London Bridge and this was consulted on in 2010. This was subsequently put on hold.
- 2.2.2 A small part of the Blackfriars Road SPD area towards the southern end of Blackfriars Road around St George's Circus lies with the Elephant and Castle Opportunity Area. We consulted on an Elephant and Castle Opportunity Area SPD/Opportunity Area Planning Framework, which was adopted in 2012.
- 2.2.3 We reviewed feedback received on both the draft Bankside, Borough and London Bridge SPD/OAPF and the Elephant and Castle SPD/OAPF in preparing the SPD for Blackfriars Road.
- 2.2.4 Consultation has also been carried out informally throughout early 2013, including developing many links with local residents, groups and business. This has included walking tours and consultation at pop up cafes. More detail on this wider consultation can be viewed at:  
[www.southwark.gov.uk/blackfriarsroad](http://www.southwark.gov.uk/blackfriarsroad)

#### *Bankside, Borough and London Bridge Sustainability scoping report.*

- 2.2.5 Usually the first stage of preparing a planning policy document is to prepare and consult on a sustainability scoping report. A sustainability scoping report was originally undertaken as part of the preparation of the draft Bankside, Borough and London Bridge SPD/OAPF in 2009/2010. However, given the amount of time that lapsed, we decided to carry out an updated sustainability scoping report.

- 2.2.6 The updated Bankside, Borough and London Bridge sustainability scoping report 2012 set out the baseline information that the eventual sustainability appraisal would draw on. The data covered a comprehensive range of economic, social and environmental issues. The sustainability scoping report fed into the development of the Blackfriars Road SPD sustainability appraisal and also informed the content of the SPD.
- 2.2.7 The Blackfriars Road SPD Sustainability Appraisal Adoption Statement sets out further information on how the sustainability scoping report and the eventual sustainability appraisal influenced the final SPD. Further information is also set out in the Blackfriars Road sustainability appraisal.

#### *Draft Blackfriars Road SPD*

- 2.2.8 The consultation on the draft SPD was the main stage of consultation. The draft SPD set out the proposed guidance for the Blackfriars Road SPD area. It focused on Blackfriars Road, where most of the change will take place. It made clear that the SPD provides further guidance to existing planning policies but that it does not repeat borough-wide policies and so it must be read alongside our other planning documents.
- 2.2.9 The draft SPD set out guidance on:
- Ideas for an emerging vision for Blackfriars Road
  - Business space
  - Mixed use town centre
  - Public realm and open space
  - Built form and heritage
  - Building heights
  - Active travel
  - Implementation

### **2.3 What happens next?**

- 2.3.1 The SPD is being taken to Cabinet for adoption on 28 January 2014. Once adopted the SPD will be monitored through the Authorities Monitoring Report (AMR). As mentioned within the SPD, we are in the process of preparing the New Southwark Plan. This will look at providing new and updated policies as well as proposals site designations on the adopted policies map. The New Southwark Plan will eventually replace the Core Strategy (2011) and the saved Southwark Plan (2007) and is likely to provide updated policies relevant to the Blackfriars Road SPD area as well as developing the vision for Blackfriars Road. For up to date information on the progress of the New Southwark Plan please see our webpage at:

[www.southwark.gov.uk/planningpolicy](http://www.southwark.gov.uk/planningpolicy)

### **3. Sustainability appraisal scoping**

#### **3.1 Who was consulted and how?**

3.1.1 In accordance with the relevant regulations for sustainability appraisals, we consulted on the updated sustainability scoping report for Bankside, Borough and London Bridge for five weeks, between 31 October and 4 December 2012.

3.1.2 We are required by the regulations to write to Natural England, the Environment Agency and English Heritage, to invite their comments on sustainability appraisal scoping reports. As best practice we also usually consult a wider group of organisations and individuals rather than just the three required organisations.

3.1.3 Subsequently we carried out the following additional consultation:

- We wrote to everyone on our planning policy mailing list which consists of around 3000 individuals, groups, prescribed bodies, neighbouring boroughs, developers and other stakeholders. Information on some of the groups this includes is set out in appendices A and B. A copy of the letter is set out in appendix C.
- We put a press notice in the Southwark News to let people know the scoping report was out for consultation and how to comment. A copy is set out in appendix D.
- We made the scoping report available on our website.
- We provided copies of the scoping report in the local library (John Harvard Library) and also made the report available on request from our council offices at 160 Tooley Street.

#### **3.2 How many comments were received on the sustainability scoping report?**

3.2.1 We received four responses to this consultation, from the Environment Agency, English Heritage, the London Fire and Emergency Planning Authority and the Theatre's Trust.

#### **3.3 Summary of responses**

3.3.1 The responses are summarised below:

##### *Environment Agency*

3.3.2 The Environment Agency (EA) noted that the high level of development proposed in the opportunity area could lead to environmental and ecological impacts that require mitigation. The EA welcomed the inclusion of sections on flooding, waste and recycling and impacts on climate change in the scoping report, but also offered further detail on each section. They also recommended further indicators that could be used to assess the

sustainability impacts of different policies in relation to flood risk (SDO15). The EA response also highlighted a range of guidance documents and data sources that could inform the eventual sustainability appraisal.

*English Heritage*

- 3.3.3 English Heritage highlighted the important relationship between the BBLB opportunity area and nearby world class heritage assets, such as the Tower of London and the Palace of Westminster. They stated that the Mayor's Setting of World Heritage Site SPG and the guidance in the individual World Heritage Site Management Plans should inform future planning guidance in the area.

*Theatre's Trust*

- 3.3.4 The Theatre's Trust welcomed the reference to world class cultural facilities and suggested some wording that would give clarity to the range of facilities that this term might cover.

*London Fire Emergency Planning Authority (LFEPA)*

- 3.3.5 Consultants acting on behalf of the LFEPA requested that the London Fire Brigade Asset Management Plan 2011 be taken into account when preparing planning guidance in the area.

**3.4 How we took these comments into consideration**

- 3.4.1 We took all of these comments into consideration in preparing the SPD and the sustainability appraisal. This included adding suggested documents into the eventual sustainability appraisal and considering these in preparing the SPD and the sustainability appraisal.

## **4. Draft Blackfriars Road SPD consultation**

### **4.1 Who was consulted and how?**

- 4.1.1 We consulted with a wide range of organisations, local groups and residents on the draft Blackfriars Road SPD. We met and exceeded the requirements of our Statement of Community Involvement (2008) (SCI). We also met the requirements of The Town and Country Planning (Local Planning) (England) Regulations 2012. Our adopted SCI requirements already go above the requirements of the 2012 Regulations and so in meeting the SCI requirements we also met the requirements of the Regulations.
- 4.1.2 In addition the Localism Act 2011 introduced new legislation that requires co-operation between local authorities and a range of other bodies and organisations as an integral part of the preparation of planning policy. This is called the “Duty to co-operate”. The Town and Country Planning (Local Planning) (England) Regulations 2012 and the National Planning Policy Framework (2012) set out these prescribed bodies and further information on the need for local authorities to work with these bodies and also their neighbouring boroughs on strategic planning issues and cross boundary issues. Appendix A of this report sets out both the prescribed bodies and our neighbouring boroughs. All of these organisations were consulted with as part of the SPD consultation.
- 4.1.3 The following tables set out the consultation carried out and how we met and exceeded the requirements of our SCI. We set out both how we met the minimum SCI requirements, and the additional further consultation we carried out. In accordance with our SCI, the SPD was available for comment for a period of 12 weeks, from 21 June to 12 September 2013.
- 4.1.4 In addition Councillor Colley and the Director of Planning met local ward Members and residents to discuss their concerns with the SPD.

Table 1: Minimum consultation as required by our SCI

Method of Consultation	Consultee	Date	Comments
<p>Planning policy documents on our website (by the formal six week period).</p>	<p>All</p>	<p>From 21 June 2013</p>	<p>The SPD and supporting documents were made available on our website from the start of consultation on 21 June 2013 for the full 12 week consultation period.</p> <p>The website was updated throughout the consultation period with details of consultation events.</p> <p>The evidence documents were also made available on the website before the start of the six weeks formal consultation.</p>
<p>Mail out to all the prescribed bodies on the planning policy mailing database (by the formal six week period).</p>	<p>All consultees defined as statutory consultees in the SCI and since defined as prescribed bodies through the Localism Act, and our neighbouring boroughs.</p>	<p>1 August 2013.</p>	<p>Mail out was sent to everyone on the planning policy mailing list on 1 August 2013.</p> <p>The planning policy mailing list includes all the prescribed bodies and neighbouring boroughs, as set out in appendix A.</p> <p>A copy the letter is set out in appendix E.</p>
<p>Display planning policy documents at relevant libraries and one stop shops.</p>	<p>All</p>	<p>June 2013</p>	<p>The SPD, supporting documents, urban design study, characterisation study, and business and retail background paper were available at the John Harvard Library. They were also available on request at Southwark Council Offices at 160 Tooley Street from June 2013.</p>

<b>Method of Consultation</b>	<b>Consultee</b>	<b>Date</b>	<b>Comments</b>
Place a press notice in the local newspaper to advertise the start of the formal consultation period.	All	1 August 2013	A copy of the press notice is set out in appendix F.

*Table 2: Additional consultation*

<b>Method of Consultation</b>	<b>Consultee</b>	<b>Date</b>	<b>Comments</b>
Mail-out to all non-statutory consultees on the planning policy database.	All on planning policy consultee database (see list in Appendix B)	1 August 2013	<p>A mail out was sent to everyone on the planning policy mailing list on 1 August 2013.</p> <p>The planning policy mailing list includes all the prescribed bodies and neighbouring boroughs (as set out in appendix A), local stakeholders and groups (appendix B) as well as other stakeholders including developers, landowners and residents.</p> <p>A copy the letter is set out in appendix E.</p>
Summary leaflet produced and distributed to all the addresses within the Blackfriars Road SPD area.	All those living or working within the SPD boundary.	July 2013	We prepared a four page A4 leaflet summarising the SPD and setting out detail on the consultation events. This was distributed to all the addresses within the SPD

			boundary (4200 addresses). A copy of the leaflet is attached in appendix G.
Announcement at Borough, Bankside and Walworth Community Council to let the community know that the SPD is out for consultation.	All who attend the community council.	26 June 2013	The summary leaflet (set out in appendix G) was made available at the community council meeting.
Planning Committee	All who attend planning committee.	3 September	The draft SPD was taken to Planning Committee for comment on 3 September 2013. Planning Committee noted the SPD was out for consultation and provided no formal comments on the draft SPD.
Summary leaflet made available at events, workshops and meetings.	All those who attended events or meetings.	June to September 2013.	The summary leaflet (appendix G) was handed out to people at our workshops and events and meetings we attended.
South Bank Forum	All those who attended events or meetings	11 July 2013	Officers gave a presentation on the SPD and took questions on the SPD.
Peabody Estate (launch of the Peabody Estate community garden)	Residents	13 July 2013	Officers attended the after-noon event for an hour to talk with residents about the SPD and hand out copies of the leaflet.

Council run workshop and discussion on the Blackfriars Road SPD	Residents, amenity groups and other interested individuals	17 August 2013	The planning policy team held a workshop/discussion on the SPD. Summary notes of the session are attached in appendix H.
Council run workshop and discussion on the Blackfriars Road SPD	Residents, amenity groups, ward members and other interested individuals	19 August 2013	The planning policy team held a workshop/discussion on the SPD. Summary notes of the session are attached in appendix I.
Bankside Residents Forum meeting	Members and attendees of the Bankside Residents Forum meeting.	2 September 2013	The planning policy team attended the Bankside Residents Forum to give a presentation on the SPD and engage in a discussion on the SPD.
Quentin and Webber Tenants and Residents Association meeting.	Members of the tenants and residents association.		The planning policy team attended the tenants and residents association meeting to give a presentation and answer questions on the SPD.
Launch of the draft SPD at a breakfast session at the New London Architecture (NLA)	Members of the NLA and Attendees of the NLA event.	21 June 2013	The Leader of the council introduced the SPD, and copies of a SPD summary leaflet were made available.

## 4.2 How many comments were received on the draft SPD?

- 4.2.1 636 representations were received from 75 groups and individuals. Further detail on who commented is set out in section 4.3 below.
- 4.2.2 The full representations and the officer comments to these representations are set out in appendix J.

### 4.3 Summary of the responses on the draft SPD

4.3.1 A summary of the representations is set out below.

#### **Members**

*Ward members for Cathedrals ward*

4.3.2 Ward councillors raised concerns about:

- The SPD being rushed through when they considered there to be two neighbourhood plans in the pipeline covering parts of the SPD area.
- The boundary of the SPD particularly the inclusion of the area to the south of St George's Circus.
- The emerging vision, including that they find it unclear from the draft SPD what the "distinct identity" will or should be. They question how it will be delivered when it is so vague. They feel that there are two separate characters within the SPD boundary. They ask how cultural, leisure, arts and entertainment uses will be encouraged. They also raise concern that the SPD emerging vision and SPD 1 should be clearer in supporting policy 1.5 of the Southwark Plan.
- The development sites, setting out some they think are incorrectly referenced, one they think should not be included and one that needs clearer guidelines.
- The number of hotels in SE1 should be restricted to ensure other important planning needs can be met.
- The acknowledgement that the impact of food, drink, evening and night time economy uses on local amenity must be considered but also request that reference should be made to the saturation area in place.
- A tall building at Southwark tube or St Georges' Circus. They comment on this within the emerging vision and SPD 5. They emphasise their strong opposition to tall buildings on the southern end of Blackfriars Road.
- Residents living in the area should have a higher profile in the list of groups involved and that ward councillors should be included in the list.

#### *Councillor Barber*

4.3.3 Councillor Barber was surprised to see some cycling provision had dropped out. He set out that it had been agreed to target re-establishing the Hopton Road through to Upper Ground under Blackfriars Road bridge link. He asks for this east-west corridor for cyclists to be re-established. He sets out that ideally this indicative cycle link would be clearly marked on figure 6.

#### **Local residents, individuals and groups**

4.3.4 41 residents/individuals and 12 local groups provided representations on the draft SPD. Representations were received from a range of groups representing both residents and local businesses. The following groups submitted representations:

- The St George's Circus Group

- Southwark Living Streets
- Bankside Residents Forum
- South Bank Employers Group
- The Albert Association
- Better Bankside
- Waterloo Quarter Business Improvement District
- Waterloo Community Development Group
- Bankside Open Spaces Trust
- Webber and Quentin Tenants and Residents Association (two sets of representations)
- St George's R.C. Cathedral

#### *General comments*

- 4.3.5 A number of residents and groups suggest that the SPD does not take into account the views of the residents already living in the area and the focus of the SPD is about development rather than the needs of residents.
- 4.3.6 A small number of residents commented that they find the document to be written in non-accessible language, not in plain English.
- 4.3.7 Some groups, including South Bank Employers Group and Waterloo Quarter Business Improvement District feel that the SPD should look more at cross boundary issues.
- 4.3.8 .Bankside Open Spaces Trust welcomes the SPD, particularly the general commitment towards open space, greening and enhancing the public realm. However they also have one key concern with the boundary of the SPD and that they think it should not overlap with the Elephant and Castle SPD boundary and so they think the SPD should be withdrawn. They contend that the council should withdraw the SPD and reissue a SPD with an appropriate boundary to interlink with the Elephant and Castle SPD.

#### *Links with neighbourhood plans and other planning documents*

- 4.3.9 Some groups and residents ask the council to demonstrate that the SPD will give a better outcome than those envisaged by neighbourhood forums. Some groups including Waterloo Development Group also raise concern that they think the SPD is premature before the forums begin their neighbourhood plans.
- 4.3.10 Better Bankside raise concern that they cannot formulate a response without the benefit of the neighbourhood plan consultation. They welcome the council's views on how the adoption of the SPD and the neighbourhood plan can dovetail.
- 4.3.11 South Bank Employers Group suggest it would be helpful to include more detail in the SPD on how the different documents such as the New Southwark Plan, neighbourhood plans etc all fit in with the SPD. They also ask that the SPD

should reference its commitment to working in partnership with South Bank and Waterloo Neighbourhood Forum throughout.

#### *Status of the SPD*

- 4.3.12 Some residents feel that the Southwark Plan and Core Strategy should be updated before the SPD is adopted.
- 4.3.13 Some groups and residents ask why the SPD is not given a different status due to the quantum of change planned. Some groups ask why it is not a master plan. Some say that they are unclear of the status of the SPD.
- 4.3.14 Some groups and residents contend that the council falls short of its obligation under the Town and Country Planning Act, the National Planning Policy Framework, regional policy and its own adopted policies by attempting to use the SPD to introduce new guidance as if it is policy, specifically for tall buildings. They feel that the SPD is not consistent with national, regional and local adopted policies.
- 4.3.15 The Albert Association set out that if the SPD is taken forward and approved by Cabinet they will consider the option of a Judicial Review.

#### *Boundaries of the SPD*

- 4.3.16 Some residents and groups questioned the SPD boundary. A number of different issues were raised.
- 4.3.17 There were some concerns around the south of the SPD boundary overlapping with the Elephant and Castle SPD.
- 4.3.18 Waterloo Community Development Group suggest that the SPD should focus on either Bankside or Waterloo, not the area proposed in the SPD. They contend that there is no need for an SPD for the proposed area.
- 4.3.19 Quentin and Webber Tenants and Residents Association ask that the boundary be redrawn or a second SPD be produced to take into account that the Blackfriars Road is completely different and separate to the surrounding streets as they view them as two completely separate areas. They also suggest that the southern part of the boundary is too wide and it should focus more on Blackfriars Road itself.
- 4.3.20 Bankside Open Spaces Trust contends that the council should withdraw the SPD and reissue it with an appropriate boundary to interlink with the Elephant and Castle SPD. They set out that they think it is contrary to national planning policy to have overlapping areas of SPDs.

#### *Vision*

- 4.3.21 Some residents and groups feel the SPD lacks a clear and inspiring vision.

- 4.3.22 Some groups and residents feel that the vision focuses predominately on larger commercial development and that the needs of small businesses and residents have not been sufficiently considered.
- 4.3.23 Some residents dislike the focus of the vision on making the area a destination where people want to “live, work and visit” as it ignores the fact that people already do.
- 4.3.24 Some residents and local groups feel that the vision does not acknowledge the differing characters of the area.
- 4.3.25 Bankside Open Spaces Trust make a number of suggested changes to the vision including wanting reference about working towards creating a coherent landscaping scheme, looking at opportunities to create new open spaces within development sites and .

*Development sites*

- 4.3.26 Some residents and local groups ask for more detail on the potential development sites, wanting plans of what is likely to happen and information on why these sites have been selected.
- 4.3.27 A number of residents and community groups object to the inclusion of development site 43: Bakerloo sidings within the SPD.
- 4.3.28 Quentin and Webber Tenants and Residents Association suggest Friars Bridge Court, 41-45 Blackfriars Road should be included as a development site.
- 4.3.29 Waterloo Community Development Group comments that many of the sites proposed for redevelopment are not in their view development opportunities.

*SPD 1: Business space*

- 4.3.30 Some residents and community groups including Waterloo Community Development Group feel that the small businesses in the railway arches should not be replaced with offices. Similarly some groups including Webber and Quentin Tenants and Residents Association think there is disregard for the principle of encouraging and helping small businesses.
- 4.3.31 Waterloo Quarter Business Improvement District welcomes the reference to flexible innovative business space. However they raise concern with the emerging trend towards loss of office space in the southern section of Blackfriars Road and emphasise that the increase in diversity of business space should not be at the expense of reducing the overall quantity. They also welcome the proposal to continue to convert railway arches into a variety of commercial uses and also welcome the promotion of active frontages along Blackfriars Road.
- 4.3.32 Bankside Residents Forum suggests that development should be required to provide affordable business space.

### *SPD 2: Mixed use town centre*

- 4.3.33 Some residents and local groups commented on needing a range of shops, with a number of residents and groups specifically mentioning wanting a supermarket. Others commented that there are too many small supermarkets and chain restaurants and that there should be more local independent small businesses.
- 4.3.34 A number of groups and residents express concern that they feel that the needs and impacts of residents are not considered enough in the SPD.
- 4.3.35 Some groups and residents including Bankside Residents Forum and Quinton and Webber Tenants and Residents Association question why hotels are being promoted when Southwark already are close to their target . There is also questioning of whether hotel facilities are actually used by local residents.
- 4.3.36 Some residents suggest that there should be no further A5 use (hot food takeaways). Some residents also suggested that new business spaces should be limited in size to attract local and SME retailers, dedicated space for art galleries, and avoid space only being used Monday to Friday.

### *SPD 3: Public realm and open space*

- 4.3.37 Some residents and groups commented on the lack of green and open spaces in the SPD area and that the council should seek to increase this provision from new development.
- 4.3.38 Some groups think the guidance should go further in encouraging improved public realm. There are comments about improving the areas around the railway viaducts.
- 4.3.39 Southwark Living Streets welcome the number of improved and proposed pedestrians links north of Southwark Station. They also provide detailed comments on possible improvements including wanting to see Christchurch and Paris Gardens enhanced, extending the green route from the river south to The Cut and Southwark Station. They also propose that development number 27 should have a through pedestrian route to address the few pedestrian routes south of Southwark Station.
- 4.3.40 Southwark Living Streets set out that they feel that the Circus is currently a barrier for pedestrian movement. They think the SPD should be clear about requirements at this intersection. This should require the central island needing to be linked to its surroundings by pedestrian crossings of the road.
- 4.3.41 Some residents and groups ask how the Allies and Morrison Blackfriars Road Public Realm Study has been taken into account in the SPD.

4.3.42 Bankside Open Spaces Trust suggest that SPD 3 should focus more on green spaces and links. They also include a list of further smaller local open spaces that they suggest should be added to the diagram. Some residents also comment on the need to protect and encourage more pocket parks and smaller green spaces and links.

*SPD 4: Built form and heritage*

4.3.43 Some groups and residents comment that there is not enough emphasis on conserving and enhance the existing heritage, specifically in relation to the building heights guidance. Concern is expressed about losing the heritage of Blackfriars Road and its surrounding area, with specific mentions of recent planning applications and approvals.

4.3.44 A number of local community groups and residents including The St George's Circus Group comment that the Elephant and Castle SPD has a list of buildings that are or have the potential to be locally listed and that it is notable that this SPD does not. There are request, including from Bankside Residents Forum to include a list of heritage buildings/local listed buildings/buildings of particular interest. Some residents and groups have also suggested other buildings to be added to the council's local list.

*SPD 5: Building heights*

4.3.45 Many residents and local groups object to the SPD's approach to building heights. The majority of residents and local groups object to the proposed building strategy for the area from Southwark Tube Station to St George's Circus. The main focus of the comments were opposing a possible tall building at St George's Circus. There were also comments on the criteria for tall buildings.

4.3.46 Some community groups including the Albert Association, The St George's Circus Group, Webber and Quentin Tenants and Residents Association and a number of residents, content that the SPD is setting new policy for building heights and that it is contrary to the Core Strategy and/or the Bankside, Borough and London Bridge Tall Building Study (2009) and/or the Tall Buildings Study 2010. They claim that the SPD is contrary to the Core Strategy in relation to tall buildings at the southern end of Blackfriars Road.

4.3.47 Residents and community groups raise concern particularly of a building of up to 70 metres at St Georges Circus with many objections that the council is ignoring the importance of St George's Circus obelisk and the surrounding conservation area. Some of the residents and groups state that the area is not a public transport node. Many residents and groups also object to the up to 30 metres along the section of the Blackfriars Road from Southwark Station to St George's Circus.

4.3.48 The contention is made by some of these groups that the council has not identified within the local development framework in advance of specific proposals, the spatial, scale and quality requirements. They feel that the

council is attempting to circumnavigate the process in an attempt to rush through the SPD to justify Barratt Homes' speculative application for a 70m tall building at St George's Circus. Some groups and residents state that there is no evidence to demonstrate that a tall building at St George's Circus would not dominate.

- 4.3.49 The St George's Circus Group content that the new guidance fails to recognise the distinctive character of southern Blackfriars Road as a mainly low-rise area with many historic listed and non-listed buildings. They also suggest that the guidance is unclear re whether the guidance for building heights applies within the St George's Circus Conservation Area.
- 4.3.50 Some residents and groups object to the proposed building heights at Southwark Tube Station, citing that the Palestra building is too tall and dominant already. Many feel that the proposed height is too high and out of context.
- 4.3.51 One resident supports the height proposals at the north end of the road.
- 4.3.52 They are also many concerns on building heights impacting on local views, wind tunneling and daylight and sunlight. A number of residents consider there to be no mention is made of environmental impact assessment, wind and daylight modeling.
- 4.3.53 Some residents and groups have raised concern that the council told UNESCO that they would take care with tall buildings and they feel that is not happening.
- 4.3.54 Southwark Living Streets are concerned that a larger number of tall buildings could form a canyon effect creating swirling winds that will cause pedestrians difficulties.

*SPD 6: Active travel*

- 4.3.55 A number of residents ask for more detail on cycling within the SPD, particularly on including segregated cycle lanes and further upgrades for cycle infrastructure.
- 4.3.56 Southwark Living Streets think a strong case should be made for a 20mph speed limit in the whole area, and especially on Blackfriars Road itself.
- 4.3.57 Bankside Residents Forum comment that the SPD should also refer to fact that many cyclists and pedestrians prefer to use the smaller scale, quieter routes away from major roads and that this should be reflected in the plan's vision and proposals.
- 4.3.58 A number of residents and community groups have commented that Blackfriars Road falls under the jurisdiction of TfL. They comment that under the Localism Act both TfL and the council are duty bound to share any consultation information regarding active travel. They ask about what plans proposed by TfL.

4.3.59 Waterloo Community Development Group feel that traffic speed, noise, pollution and traffic volumes are not addressed in the SPD. They suggest that the road should be narrower at points and the pavements wider.

#### *Implementation and infrastructure*

4.3.60 A number of residents and groups raise that the SPD does not plan for the necessary infrastructure including social amenities such as community space, health facilities, children's play facilities and other open areas.

4.3.61 Some groups and residents think there should be more detail on section 106 and the Community Infrastructure Levy as well as more detail on infrastructure costs and delivery. South Bank Employer's Group contend that ideally the SPD should await further input from the two neighbourhood forums.

4.3.62 There were some comments from residents setting out existing problems such as the amount of construction taking place, some comments on streets being used for loading/parking areas for construction etc.

#### *Housing and residents*

4.3.63 A number of residents and groups comment that they feel that the SPD is favouring developers and there is not enough emphasis on the local community and its needs.

4.3.64 There were some comments raising concern on the amount of private housing being delivered in the area and the need for more affordable housing in the area. Some groups and residents request further information and guidance on affordable housing policy and delivery. Some groups such as Bankside Residents Forum comment that the council's affordable housing policy already has no credibility and should be actively written into the SPD.

4.3.65 South Bank Employer's Group suggests that the SPD should consider how it can support local universities in their student housing needs.

#### *Environment and sustainability*

4.3.66 South Bank Employer's Group comments that the SPD is silent on carbon reduction. They refer to the need for further guidance on green infrastructure within the SPD.

4.3.67 One local resident commented that they would like to see an overarching environmental policy and there were a number of comments on the need for SPD 5: Building heights to focus more on the impacts of the environment.

4.3.68 There were a few comments about the need to restore and renew the existing building stock rather than complete redevelopment.

### *Equalities analysis*

4.3.69 One resident commented on the equalities analysis, stating that it is entirely devoid of evidence for any of its assertions. It does not appear to have resulted from any factual base nor from consultation with the affected groups.

### *Urban design study*

4.3.70 Bankside Residents Forum comments that they feel that the fact that the evidence base has been prepared in house gives the outcomes less credibility.

### *Consultation*

4.3.71 A number of residents and community groups have raised concern that they feel that the SPD has been rushed through.

4.3.72 A small number of residents and local groups expressed disappointment that the SPD was launched at the NLA, outside of the borough.

4.3.73 Similarly a small number expressed disappointment that that consultation took place over the summer holiday period.

4.3.74 Some residents raised concern that they felt that there was inadequate consultation time.

### **Developers/landowners**

4.3.75 The following landowners/developers made representations on the SPD.

- London South bank University
- Emyrean Developments
- CEREP Sampson House, CEREP Ludgate House and Carlyle Real Estate Advisors LLP
- Linden Homes
- Lenta Business Centre
- Guidewell Ltd
- Network Rail
- CBRE Lionbrook & Southwark Charities
- Blackfriars Limited
- Development Securities
- Barratt London
- Dunedin Property Asset Management
- 34 - 68 Colombo Street

### *General comments*

4.3.76 A large number of developers and/or landowners support the production of the SPD.

### *Boundaries of the SPD*

4.3.77 London South Bank University suggest that the boundary of the SPD be extended further south to take in more of the Elephant and Castle opportunity area to include two sites within London South Bank University's ownership.

### *Vision*

4.3.78 A number of developers and landowners overall support the emerging vision. In particular there is support for the overall vision for tall buildings.

4.3.79 Some developers suggest that the vision should also mention new residential development and the continued provision of housing.

4.3.80 London South Bank University ask for higher education to be acknowledged in the vision.

4.3.81 Network Rail support the aspirations in the vision but ask that it refers to employment opportunities rather than small businesses where it refers to the railway arches in line with their objectives.

### *Development sites*

4.3.82 Some of the developers/landowners request further sites to add to figure 5: Potential development sites. This includes the following:

- Lenta Business Centre suggests the Foundry Annex, located on Webber Street and Glasshill Street.
- Network Rail suggests three new sites to identify as development site: Bear Lane Site, Dolben/Gambia Street Site, and Great Suffolk Street/Union Street/Ewer Street site.
- Guidewell Ltd suggest further land within their ownership: Rennie Court, the Doggetts Coat & Badge Public House and River Court
- 34-68 Colombo Street – suggest their site Colombo Centre, 34-68 Colombo Street
- London South Bank University suggest:
  - -Caxton House on Borough Road
  - -The Passmore Edwards Library/12 Borough Road on Borough Road
  - -Peabody Hugh Astor Court housing on Thomas Doyle Street

4.3.83 CBRE Lionbrook and Southwark Charities request that the boundary of site 9: Quadrant House and Conoco House be extended.

4.3.84 Dunedin Property Asset Management questions the inclusion of a number sites and their impact on St George's Circus.

*SPD 1: Business space*

4.3.85 There is some support for the guidance.

4.3.86 Development Securities, Barratt London, CEREP Sampson House, CEREP Ludgate House and Carlyle Real Estate Advisors LLP put forward that greater emphasis needs to be placed on residential development and that not all of Blackfriars Road is suitable for Grade A office accommodation or larger floorspace offices.

4.3.87 Lenta Business Centre find that SPD 1 is too restrictive and suggest amendments to the guidance to incorporate more flexibility such as a credit scheme between developments and allowing relocations of existing business space onto another existing business site within the borough.

4.3.88 Network Rail request that paragraph 3.6 refers to employment opportunities rather than small business when it refers to the opportunities in the railway arches to be consistent with their objectives and the NPPF.

*SPD 2: Mixed use town centre*

4.3.89 Some of the developers/landowners support the guidance.

4.3.90 A number of developers/landowners contend that housing should be included within SPD2 or somewhere else within the SPD.

4.3.91 A number of developers including CEREP Sampson House, CEREP Ludgate House and Carlyle Real Estate Advisors LLP, Barratt London and Development Securities contend that the fact box on town centres uses is not consistent with the NPPF.

4.3.92 Blackfriars Limited agrees that demand for hotel rooms in Southwark will continue to grow. Dunedin Property Asset Management asks why hotels are being promoted when Southwark is already close to achieving the GLA requirements.

*SPD 3: Public realm and open space*

4.3.93 Some developers/landowners support the guidance.

4.3.94 A few developers commented that it will not always be possible to provide substantial areas of public realm.

4.3.95 London South Bank University asks that London Road is also shown on figure 6 as a possible green route and key approach.

#### *SPD 4: Built form and heritage*

4.3.96 Some developers/landowners support the guidance and its approach to promoting high quality design.

4.3.97 Network Rail ask for flexibility with how the council requires the use of materials that are considered sympathetic to the heritage of the area as there may be circumstances where alternative methods may be required to allow the function of the railways. They specifically object to the stringent use of “resisting the use of solid external roller shutters”.

#### *SPD 5: Building heights*

4.3.98 Overall the majority of the developers/landowners support the overarching vision for more tall buildings but have detailed comments on the potential heights of the tall buildings and the criteria required for tall buildings.

4.3.99 Network Rail thinks that the tall building guidance should be reviewed and that the stringent control over the location of tall buildings should be relaxed. They suggest an alternative southern boundary for the tallest buildings as the railway viaduct between Waterloo East and London Bridge. They set out that this would not impact upon the protected strategic views.

4.3.100 Network Rail also think that the thresholds in the guidance for Southwark tube and at St George’s Circus are too restrictive and should say “in the region of 70 metres” rather than up to 70 metres.

4.3.101 Linden Homes question what they consider to be arbitrary building height limits in the SPD. They contend that buildings that exceed 30 metres could be located in locations along Blackfriars Road.

4.3.102 Guidewell Ltd support SPD 5 in not setting a specific upper limit to building heights on the north of Blackfriars Road and suggest that it would be helpful if the SPD makes it clearer by stating that there is no defined upper height limit at this northern end.

4.3.103 Dunedin Property Asset Management objects to a tall building at St George’s Circus.

4.3.104 London South Bank University is generally supportive of the building heights strategy in the SPD, especially the identification of St George’s Circus as a

suitable location for a tall building. They ask for further clarification on whether it is envisaged for single tall building or a cluster of tall buildings.

- 4.3.105 Barratt London welcomes the acceptance of a tall building at St George's Circus. However they feel it is inappropriate to prescribe a height of up to 70 metres. Instead it would be appropriate to note the potential for a tall building at 128-150 Blackfriars Road/ St George's Circus which represents a step down in height from the very tall buildings at the north of Blackfriars Road and at Elephant and Castle which are up to mid 40 storeys.
- 4.3.106 Development Securities welcomes the acceptance that Southwark Tube is an appropriate site for a tall building. However, they question the appropriateness of including the 70metre height as they do not feel it is appropriate to apply what they consider to be a cap on the height.
- 4.3.107 Development Securities, Barratt London and CEREP Sampson House, CEREP Ludgate House and Carlyle Real Estate Advisors LLP support the objective of exemplary standard of design and high quality accommodation for taller buildings. Barratt London requests that reference should be included to exceeding the minimum dwelling size standards within the London Plan.
- 4.3.108 A number of developers including Development Securities, Empyrean Developments, Blackfriars Limited and Barratt London consider that some of the criteria for tall buildings are too prescriptive. Specifically there are objections to the requirement for publically accessible areas on upper floors, and the link requiring the amount of public space at the base of the building to relate to its height.

#### *SPD 6: Active travel*

- 4.3.109 Network Rail support SPD 6.
- 4.3.110 London South Bank University recommends that the TfL modeling of Blackfriars Road should be extended to include the whole of London Road.

#### **Greater London Authority**

- 4.3.111 The Mayor sets out that the SPD appears comprehensive and should prove to be a useful tool for both planners and prospective developers.
- 4.3.112 The Mayor in particular supports the council's approach to tall buildings and its building height strategy in the Blackfriars area. In Vauxhall Nine Elms Battersea OAPF some heights were limited to avoid them appearing in the Mayor's strategic views. As this is not the case on Blackfriars Road, the Mayor would welcome a more flexible approach, suggesting the wording should say "in the region of 70/30metres" rather than "up to 70/30 metres". He also comments that as stated in the SPD, it will be important to demonstrate that the buildings contribute positively to London's skyline.

#### **Transport for London (Borough Planning)**

- 4.3.113 Transport for London (TfL) (Borough Planning) responded that they are the Highway Authority for Blackfriars Road and that as they are in early stages of designing urban realm improvements they are not in a position to support specific proposals (they specifically mention lighting and public art).
- 4.3.114 They request that the vision is revised to reflect the emerging proposals in the Mayor's Vision for Cycling in London. They also request that the wording "ensuring vehicular traffic continues to move smoothly is removed" as TfL will be undertaking detailed and London wide traffic modeling to test design options and at present are unable to determine the likely impact of proposals upon vehicular traffic.
- 4.3.115 TfL (Borough Planning) encourages the council to continue to work further with Network Rail and where appropriate with South Eastern to discuss future options including those for Waterloo East.

#### **Transport for London (Property)**

- 4.3.116 Transport for London (TfL) Property support site 18, Southwark Tube Station, and site 43, TfL Bakerloo sidings.
- 4.3.117 TfL Property support the principle of development on site 18 but also comment that whilst a tall building is welcomed at this location it can only be achieved if the structural capacity of the existing station structure remains unaffected and disruption to the tube network is not incurred.
- 4.3.118 They ask for additional wording to be inserted into the supporting text of SPD5: Building heights to make it reflect the operational and engineering constraints on this site.
- 4.3.119 TfL Property raise that on site 43, Bakerloo Sidings, they require the support of planning policy for a tall building on site 43, to ensure viability of developing this site.

#### **English Heritage**

- 4.3.120 English Heritage in general supports the aims of the SPD to provide a framework to guide future development in a coordinated manner. However they think that a masterplan should be prepared for the Blackfriars Road area due to the scale of proposed change.
- 4.3.121 English Heritage raise concern that they think including an emerging vision is beyond the scope of a SPD as they think it is setting policy. They also raise concern that they think the SPD sets new policy for building heights further than the policy set out in the Core Strategy.
- 4.3.122 English Heritage support the encouragement of the railway arches to be used for a range of business including creative and cultural industries but also feel

that we should promote this concept to other buildings as well as the railway arches.

4.3.123 English Heritage welcome SPD 4's emphasis on the conservation and enhancement of the historic environment, but are concerned that the many opportunities sites identified could result in the loss of buildings of particular local interest. They are concerned that the scale of development proposed and the potential loss of buildings of local interest could mean the resultant character does not reflect the current positive aspects of the area.

4.3.124 They ask the council to look at undesignated heritage assets within the SPD.

4.3.125 They are concerned that the significance of the historic environment may be potentially harmed by the change in heights proposed in the SPD. They think that greater justification needs to be given for the north of Blackfriars Road where they are no defined height limit. They are concerned about the impact of these tall buildings on heritage assets including north of the river.

4.3.126 English Heritage also asks what is being proposed at Southwark tube station and St George's Circus. They do not see the justification for a taller landmark element at St George's Circus especially due to the grade 2 \* listed obelisk already in their view providing a legible historic landmark.

4.3.127 English Heritage also provides some minor comments on the sustainability appraisal.

### **Environment Agency**

4.3.128 The Environment Agency welcomes the SPD and supports the emerging ideas for a vision on Blackfriars Road. They set out that they would wish to see developments fronting the River Thames aligning with the Environment Agency Thames Estuary 2100 (TE2100) Plan. They will support Southwark in interpreting this data to ensure the revision of the borough Strategic Flood Risk Assessment

### **NHS Southwark**

4.3.129 NHS Southwark carried out a Health Impact Assessment (HIA) on the draft SPD. They identified both potential positive and negative impact that the SPD would have on health. They looked at the impact on the SPD on things such as health, mental health and wellbeing; impact on conditions that would indirectly affect health; affect on individual's own ability to improve their own health; and whether there will be a change in demand of health and social care. They identified many positive impacts such as the SPD helping to create an environment conducive to active travel having particularly positive effects for obesity, diabetes and cardiovascular disease. Similarly they identified that an increase in the number of well designed open spaces could enhance opportunities for exercise and children's play.

4.3.130 Some of the potential negative impacts identified included a possible negative impact on climate change due to increase population and large developments which may have an impact on global health. NHS Southwark also identified that a significant population increase will create an increased need for all health services and this needs to be planned.

#### **NHS London Healthy Urban Development Unit**

4.3.131 NHS London Healthy Urban Development Unit comment that there is no reference to analysis of current uses on the 43 development sites.

4.3.132 They support SPD2: Mixed town centre and SPD3: Public realm and open space.

4.3.133 They comment that they support paragraph 3.15 which looks to seek improvements to social infrastructure and keep the need for new infrastructure under review. They also comment that there is a need to address the intermediate and future impact of housing and population growth in the area. They would welcome an updated Development Capacity Assessment for the area.

4.3.134 They also comment that they support the intention to manage the provision of student accommodation as a concentration of student housing can have a significant impact on healthcare services.

#### **4.4 Summary of the changes made to the SPD**

4.4.1 All the representations received and feedback received through consultation events has been fed into the preparation of the final SPD. A summary of proposed changes to the SPD is set out below. These changes are based on issues raised and comments made in representations and through events, as well as minor factual updates and updates for clarity and consistency. The SPD has been reviewed and updated to ensure plain English is used throughout.

4.4.2 A tracked change version of the SPD is available to view on our website at:

[www.southwark.gov.uk/blackfrairsroadspd](http://www.southwark.gov.uk/blackfrairsroadspd)

##### *SPD section 1: Introduction*

4.4.3 The introduction has been updated in response to the representations received to explain more clearly why the SPD is needed, due to the scale of growth proposed and to ensure that the pressure for residential development is balanced with the need for a vibrant street. The SPD has been updated to make it clearer that most of the change will take place on the Blackfriars Road and that much of the surrounding area's character and historic value will continue to be protected, especially where there are conservation areas and listed buildings.

- 4.4.4 Wording has been added to the SPD to further explain that the Blackfriars Road lies mostly within the Bankside, Borough and London Bridge Opportunity area, with a small part at the southern end of the road falling within the Elephant and Castle Opportunity Area. Updates have been made to the SPD to set out that the Blackfriars Road SPD will replace the guidance for the Elephant and Castle SPD/OAPF for the overlapping area.
- 4.4.5 The SPD has been updated following consultation to make it clearer that neighbourhood plans are currently being prepared by the local community and that once adopted the neighbourhood plans will form part of Southwark's development plan and will be used to make decisions on planning applications.
- 4.4.6 The SPD has also been updated to cross refer in section 1 to a new appendix which lists the key borough wide policies and guidance in the Core Strategy, saved Southwark Plan and supplementary planning documents. This is to address the comments raised through consultation expressing concern that a number of topics such as housing and environmental standards are not covered in the Blackfriars Road SPD.
- 4.4.7 The SPD boundary has been amended following consultation to extend slightly further south along the boundary of Thomas Doyle Street and Keyworth Street, as suggested by London South Bank University.

#### *SPD section 2: Vision for Blackfriars Road*

- 4.4.8 The existing London Plan (2011) and Core Strategy (2011) visions have been moved to an appendix of the SPD rather than the main section of the SPD.
- 4.4.9 Updates have been made to the ideas for the emerging vision for Blackfriars Road to take into account the comments raised in the consultation responses. The updates include:
- Making it clearer that the transformation of the Blackfriars Road will help regenerate the area from the river along Blackfriars Road and stimulate change at the Elephant and Castle.
  - Making it clearer that the majority of change will take place on Blackfriars Road and that most of the surrounding area will continue to see little change and the character will be protected and enhanced.
  - Referring more specifically to the different types of uses that will be encouraged along the Blackfriars Road including higher education, community facilities, children's play facilities and health facilities.
  - Providing more detail on the potential improvements to the Blackfriars Road itself, making it safer and more encouraging for cyclists and pedestrians through the creation of a segregated route for cyclists.

#### *SPD section 3: Strategies and guidance*

##### *SPD 1: Business space*

- 4.4.10 Wording has been added to the “we are doing this because” section of SPD 1 to refer to the importance of small and medium (SMEs) sized enterprises.
- 4.4.11 Updates have been made to SPD 1 to make it clear that new business floorspace should be designed flexibly to accommodate a range of unit sizes including space suitable for small and start-up businesses to help meet a variety of needs. The “we are doing this because section” of SPD 1 has also been updated to cross refer to saved Southwark Plan policy 1.5 which aims to protect small business units. An update has also been made to refer to employment opportunities within the railway arches in line with Network Rail’s objectives.
- 4.4.12 A minor update has also been made to the “we are doing this because” section to refer to London South Bank University’s new Clarence Centre for Enterprise and Innovation.

*SPD 2: Mixed use town centre*

- 4.4.13 There were many representations raising that housing should be looked at through the SPD. The SPD purposely does not provide detailed guidance about housing because the borough wide policies and guidance in the Core Strategy, saved Southwark Plan, Affordable Housing, and Residential Design Standards supplementary planning documents already cover housing sufficiently. There is no differing approach for the Blackfriars Road SPD area. However, as previously set out in the draft SPD, housing is an appropriate use within town centres and thus SPD 2 has been updated to include residential into the bullet point on encouraging a range of uses. The supporting text has also been updated to make it clearer that there is residential development in the area, that more people will be living there in the future and that the increased provision of town centre uses will benefit residents. The fact box on town centre uses has also been updated to make this clearer by referring to the updated definition of town centre uses in the National Planning Policy Framework. An appendix has also been inserted to cross refer to the key Southwark plan policies including those on housing.
- 4.4.14 An update has been made to the “we are doing this because” section of SPD 2 to better describe the existing different uses across the SPD area.
- 4.4.15 An update has been made to make it clearer that space should be designed flexibly to accommodate a range of units sizes, in order to be consistent with SPD 1.
- 4.4.16 SPD 2 sets out that we will consider the impact of all proposals for food, drink, evening and night time economy uses on the overall mix of the area and on local amenity. Text has been added into the “we are doing this because” section to cross refer to the Borough and Bankside licensing saturation area.
- 4.4.17 It has also been made clearer that opportunities to increase and improve the range of infrastructure and facilities will be maximised referring specifically to health facilities and community facilities, as these were issues raised in a number of representations.

*SPD 3: Public realm and open space*

- 4.4.18 Minor changes have been made to SPD 3 to ensure consistency in referring to locations as gateways and nodes as well as making it clear the new links should enhance way finding. Bankside Open Spaces Trust have been added to the list of groups that we work with in delivering this guidance.
- 4.4.19 The “we are doing this because” section of SPD 3 has been updated to include new text cross referring to the Open Space Strategy (2013) and how we will work with developers to encourage new open space provision on development sites in lines with the recommendations in the Strategy.

*SPD4: Built form and heritage*

- 4.4.20 English Heritage and a number of other representations raised the issue of needing to “complete” the Circus and to reinforce its geometry and character. SPD 3 already refers to this for public realm schemes. SPD 4 has been updated to also refer to this aspiration for development to reinforce the geometry and character of the Circus.

*SPD 5: Building heights*

- 4.4.21 Minor changes are proposed to SPD 5 to make the council’s approach clearer in response to the representations received. Additional text has been added to the bullet point about a taller building towards St George’s Circus. The new wording clarifies that a tall building of up to 70 metres could provide a focal point at the southern end of Blackfriars Road and that as well as needing to be set back from the Circus it should also sustain, enhance or better reveal heritage assets and their settings. It cross refers specifically to the St. George’s Conservation Area and the Grade 2\* listed obelisk. The supporting text has also been updated for clarity and consistency.
- 4.4.22 A minor update as also been made in relation to a point made by English Heritage who felt that the approach to the northern end of Blackfriars Road and buildings heights and whether there will be cluster of tall buildings is unclear. SPD 5 has been updated to refer to a cluster at the northern end of Blackfriars Road.
- 4.4.23 The policy approach within the SPD is considered to be consistent with the NPPF (2012), the London Plan (2011), the Core Strategy (2011) and the saved Southwark Plan (2007), taking into account changes in the surrounding context since developing the Core Strategy vision in 2009/2010. The London Plan, Core Strategy and saved Southwark Plan form the development plan for Southwark, with the NPPF setting out national guidance. The development plan sets out the policies for tall buildings. Key policies are: London Plan policy 7.7 which identifies that tall and larger buildings should generally be limited to sites in the Central Activities Zone, opportunity areas, areas of intensification or town centres that have good access to public transport. Blackfriars Road lies within the Central Activities Zone, is an opportunity area and a town centre with good access to public transport. Core Strategy strategic policy 12 requires tall buildings to have an exemplary standard of design and identifies locations where tall buildings could go. The Core

Strategy vision for Bankside and Borough refers to the council setting out in detail which sites are appropriate, sensitive and inappropriate for tall buildings through the supplementary planning document/opportunity area framework. Saved Southwark Plan policy 3.20 sets out criteria for considering applications for tall buildings and applies across the borough.

- 4.4.24 The guidance in the Blackfriars Road SPD provides detail on how to implement these development plan policies specific to Blackfriars Road. This approach is supported by our evidence base including the Blackfriars Road Urban Design Study (Appendix I) which has been prepared in accordance with CABE and English Heritage “Guidance on Tall Buildings”, 2007.

*SPD 6: Active travel*

- 4.4.25 The SPD has been updated to refer to work being carried out by Transport for London to create a segregated route for cyclists as well as improving links between the different modes of transport.

Section 4: Implementation

- 4.4.26 Factual updates have been made to the implementation section to reflect that further sites now have planning permission and that more sites may come forward in the future.
- 4.4.27 Minor updates have also been made to include South Bank and Waterloo Neighbourhood Forum in the list of groups we work with.
- 4.4.28 The reference to the map and list of potential development sites has been moved to the section on implementation. The figure and list has been updated following consultation to include some new sites, amend site boundaries and to correct errors. Wording has been added to the SPD to make it clearer that the map and list are not exhaustive and that some sites may be completely redeveloped whilst others may experience less change. The list has also been updated to remove the column referring to the status of each site as this will quickly become out of date once the SPD is adopted.

## **5. Monitoring our consultation**

### **5.1 Why we monitor our consultation?**

- 5.1.1 Our statement of community involvement indicates that the success of consultation can in part be measured by the numbers and diversity of consultees and respondees. This is particularly important for Southwark which is very varied and includes many traditionally hard to reach groups. We want to ensure the final SPD meets the needs of those living, working and visiting the area.
- 5.1.2 We monitor our consultation at every stage of policy preparation so that we can see where we need to engage more with certain groups at the next stage of consultation.

### **5.2 How we monitor our consultation**

- 5.2.1 After every stage of consultation we look at the different people and groups that have commented on the planning document and look back over the events and consultation activities we carried out to see whether we should have targeted more or different groups. We feed this into our planning for future consultation on our planning policy documents. Feedback from this consultation will specifically be used to consider how best to consult on the New Southwark Plan.
- 5.2.2 We want to try and encourage people from all groups and areas to get involved in the preparation of our planning documents. This includes people across all nine protected characteristics groups including different ethnic, age and religious groups. Further information on the potential impact of the SPD on each of the protected characteristic groups is also set out in the SPD equalities analysis.
- 5.2.3 Effective consultation also includes involving people from different organisations to include local residents, local voluntary and community sector groups, local businesses and traders, landowners, prescribed bodies such as the English Heritage and developers and landowners.
- 5.2.4 Consultation on the SPD has sought to engage with different groups and individuals that may be affected or may be interested in the Blackfriars Road SPD. The SPD area is a very mixed area, with many businesses in the area as well as residents. Our consultation has subsequently included workshops with residents and community groups, attending South Bank Forum meeting (which includes MPs, ward councilors, residents and local businesses), meeting with interested prescribed bodies including the GLA and English Heritage and making developers aware of the SPD at the New London Architecture event. We have sought to make the SPD as clear as possible so that everyone could comment on it, including through the preparation of the A4 leaflet summarising the SPD. By distributing the summary leaflet to all the addresses within the SPD boundary we sought to engage as many people and groups as possible. Many people who subsequently attended our

consultation workshops told us that they did so after receiving the leaflet. This has been important in ensuring that we engaged effectively and thoroughly on the SPD.

**Appendices are available in two separate documents.**