

Matter 1 – Procedural and legal requirements including the Duty to Co-operate

1.6

Is the approach to site selection in the New Southwark Plan justified, including the evidence in the Sites Methodology Paper [EIP82] and consistent with national policy and in general conformity with the London Plan?

Paragraph 4.6 of EIP82 Site Allocations Methodology Report submitted by the Council states “The NSP Submission Version did not include indicative development capacities for each Site Allocation because the purpose of the Site Allocation was not to provide a detailed design brief for each site” “the NSP does not provide detailed guidance regarding appropriate building height. Again, this is because the appropriateness of building heights should be determined through a detailed assessment of genuine development proposals in relation to their context.”

The statements above in EIP82 are further confirmation of how the Council is unclear on what they are trying to achieve when it comes to development for each site allocation, and their aspirations are merely limited to floor area targets. This blind leading the blind approach has led to free will of developers completely disregarding conservation areas and listed buildings in their greedy development proposals in particularly in site allocation areas NSP50 and 51.

There is no evidence in EIP82 or the NSP as to why a basic height limit policy cannot be adopted. The council is aware of the ‘context’ for each site allocation area. There should be a detailed assessment including any impact developments will have on affected heritage assets in and around the site allocations. These site allocations therefore fail to comply with Policy 7.7E of the London Plan which requires the Council to identify areas ‘sensitive or inappropriate for tall buildings’.

If the council has selected sites for development, they ought to have defined development parameters – height being of paramount importance especially ones located near heritage assets.

Other London Boroughs such as Westminster has classified heights based on their context and explained the visual impact as well as appropriate locations based on each classification in ‘Westminster Building Height Study 2019’.

The Newham Local Plan 2018 too sets out indicative building heights appropriate for each of its site allocations.

The NSP however does not give a clear definition for a tall building except in general terms as being 30m tall or substantially taller than the surroundings.

Tall buildings are not acceptable in NSP50 and 51 due to their close proximity to heritage assets and Bermondsey street conservation area. These site allocations were demarcated by the Council without any proper consultation undertaken with the general public and purposefully excluded from Neighbourhood Area application of the Old Bermondsey Forum.