

## Matter 2 – The Spatial Strategy and Area Visions

### Issue 1

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

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)?

#### AV13 Old Kent Road Area Vision

No study has been undertaken of the detrimental impact caused by tall buildings approved in the recent past (as part of AAP) on the Pages Walk conservation area. The Policy further adds injury by its very definition of Tall buildings which says "...significantly higher than surrounding buildings or their emerging context." The Council has already granted consent for buildings of greater height than what is recommended in the AAP thereby directing the 'emerging' context to allow further taller buildings. The Policies also fails to comply with Policy 7.7E of the London Plan which requires the Council to identify areas 'sensitive or inappropriate for tall buildings'.

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?

#### AV11 The London Bridge Area Vision

The officer's response to our previous representation is not satisfactory as it simply notes that the "future office needs in the new pandemic situation, will be monitored". It does not elaborate how the monitoring will be varied out notwithstanding the immediate effects on the Area Vision. In so far as the effects of the COVID-19 pandemic is clear the vision is obviously out of date. For example, the '2020 Q3 UK property market survey' published by RICS concludes deeply negative outlook for retail and office rents.

Parts of NSP 50 and 51 are currently in use as temporary outdoor venue called 'Vinegar Yard' featuring food vendors, bars, art installations and boutiques. Vinegar Yard also includes a market selling vintage fashion, antiques, vinyls, books, jewellery and such. It has been a huge success and proves that maximising floor areas through Area Visions and Site Allocations are not the only way to develop an area. This notion is supported by the London Plan policy GG1 – Building strong communities and inclusive communities. These two site allocations are an excellent opportunity for introducing and adapting existing buildings to "Ensure that new buildings and the spaces they create are designed to reinforce or enhance the legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements" as set out in GG1.

## AV.11 – London Bridge Area Vision

### 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?

The 2010 Tall building study states that “New tall buildings should provide a transition from the scale of existing tall buildings towards lower height development in the surrounds.” However the NSP erroneously refers to the Shard as the existing tall building to draw height inference from. It states “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.”

Shard is a building that stands in isolation and in contrast to its historic surroundings however the Council is using the Shard as a reason to essentially declare the whole of London Bridge area as suitable for tall buildings and nothing less. Therefore, the policy is not consistent with the London Plan Policy D8 C4. Cumulative impacts and C1. Visual impacts.

## Issue 2

### 2.18

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

SP2 says among others that it would enhance local distinctiveness and heritage-led regeneration by requiring the highest possible standards of design, creating vibrant, attractive, healthy, safe and distinctive buildings and places that instil pride of place in all our communities. However, the site allocations NSP50 and 51 have so far only attracted generic office buildings overwhelmingly tall which do not contribute to the character of the locality but in fact destroy the heritage.

There is lack of clarity on preserving buildings of local interest, views to such buildings, historic street patterns, features, trees etc. all things that contribute to the ‘character and heritage’ of the Borough. Policy SP2 is not entirely on the same aspirations of London Plan policy GG2 which states “Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London’s distinct and varied character”