

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.

2.1 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?

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?

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)?

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?

2.13 (AV.11 – London Bridge Area Vision) Is the vision consistent with NSP Policy P16 and the evidence base in relation to tall buildings, particularly in regards to the Shard?

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?

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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?

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?

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

2.19 Is there a role for Supplementary Planning Documents in supporting regeneration, including planning frameworks for opportunity areas or do existing and forthcoming Area Action Plans provide necessary detail for those areas of particular change in the Borough?

Relevant policies / evidence:

- Publication London Plan 2020,
 - GG1 Building strong and inclusive communities: A, G
 - GG2 Making the best use of land: D, E, F, H
 - Policy GG5 Growing a Good Economy: F(Heritage) H (Circular Economy)
 - Policy GG6 Increasing efficiency and resilience: A (Circular Economy) D (Local Infrastructure)
 - Policy SD1 Opportunity Areas: B (1, 2,3,4,5,6,8,,9); 2.1.1, 2.1.4,
 - Policy SD4 The Central Activities Zone (CAZ):A,C,K,L,M, N(2); 2.4.19
 - Policy SD10 Strategic and local regeneration: B, C, D; 2.10.3, 2.10.4-6
 - Policy D1 London's form, character and capacity for growth: A, B ; 3.1.1 - 3.1.8
 - Policy D3 Optimising site capacity through the design-led approach; 3.3.1-3.3.4; 3.3.20-3.3.23
 - Policy D4 Delivering good design: A,E; 3.4.1
 - Policy D5 Inclusive design: A (collaboration); 3.5.5 (involvement)
 - Policy D8 Public Realm: B, D, F, I, L, M,
 - Policy D9 Tall Buildings: A (Definition), B (Locations), C (Impacts)
 - Policy S1 Developing London's social infrastructure: A,B,
 - Policy HC1 Heritage conservation and growth
 - Policy HC3 Strategic and Local Views
 - Policy G1 Green infrastructure
 - Policy G4 Open space
 - Policy SI 7 Reducing waste and supporting the circular economy: A,C; 9.7.7
- Draft Bankside, Borough and London Bridge SPD 2010
- Bankside, Borough and London Bridge Characterisation Study July 2013
- Social & economic benchmark of the residential areas most affected by the St Thomas St developments September 2019 (LBS, TLB, Social Life)
- LB Newham Local Plan 2018: Introduction, S1 Spatial Strategy and Strategic Framework: 1. Strategic Principles, 2. Vision based spatial strategy.
- Croydon Opportunity Area Framework and Masterplans
- Kentish Town Planning Framework July 2020
- Draft Future Shoreditch AAP
- OBNF Comparative Character Study 2018
- OBNF Draft Neighbourhood Plan 2020-2021

The vision for the borough is not positively prepared rather it is a fragmented and self defeating knee jerk reaction to targets of which it is not in control and will be unable to monitor the impact of (also relevant to Matter 9). As per previous representations the emerging principle of regeneration working for all is potentially extremely positive however the plan cannot achieve this because at present because it has evolved without building up a meaningful evidence base through collaboration with people who live and work in the borough, and knitting this to a strong monitoring framework. Two examples of the lack of justification and clarity in the vision are related to the economy and to tall buildings (also relevant Matters 5 and 8). The Strategic Targets headlines under 'developing business' betray the lack of a strategic, balanced, flexible and locally sensitive approach to the CAZ, office space and industrial space (as required by the London Plan). This is compounded by the lack of clarity across the following distinct maps: Key Diagram, Heritage, Town Centres and Industrial Locations, Policy Areas, Tall Buildings and Views which shows (alongside a lack of protection for the wider economy and for highstreet settings) no relationship between the proposed 'Possible locations for Tall Buildings' and Conservation Areas / Heritage Settings and does not identify the site allocations outside the pink shaded area where tall buildings are being proposed (without absolute or contextual height limits). Newham's Local Plan Introduction, Spatial Strategy and Strategic Framework is much more clear in providing orientation, evaluation, hierarchy and vision, is more ambitious and justified in its goals.

In the IIA and Appendices it is unclear as to how the area vision and site allocation identification and alternative options have been considered spatially. There are many yellow (uncertain) boxes in the matrices and the general results against time of IAOs 5, 6, 8, 11, 12 and 13 in particular (both in relation to area/site and the plan as a whole) seem questionable. In the appraisal of chosen Option B (Place Making and Place Shaping) it is unclear what is meant by the following under "What are the significant negative effects?" "6.76 The site allocations and area visions seek to steer development opportunities that already exist towards delivering a sustainable regeneration strategy. Furthermore they are supported by the strategic and development management policies to further mitigate negative effects." There appears limited justification of the options - in one allocation at least the lower option is dismissed in a single sentence.

The London bridge area vision strategy is unclear and contradictory (as per previous representations) and the site allocations appear to have been selected and developed in the absence of a planning framework (draft SPD 2010). The lack of a strategy and a locally sensitive evidence base has resulted in planning applications for over scaled development driving/shaping the development of the area vision and site allocations rather than the reverse as should be the case - to the effect that the current iterations propose approx. 220-240% of the FAR ratios and go directly against local opinion (as highlighted in previous representations). The policies currently fail to respect and resolve the transition in scale and character (for example from the Shard to the Bermondsey Street Conservation Area) and threaten the complete and irreversible loss of the area's unique fabric, character, local economy, social cohesion and future sustainability. To be sound in relation to the London Plan, hierarchy, clarity and sensitivity and appropriate detail (at least in reference to the allocations) are required whereas the AV.11

text includes sentences like (development must) “Build on the fabric of local alleyways and yards to create quiet, green routes with clean air” and “Attract global commerce with headquarter and local offices” with a map simply outlining the site allocations. There appears to be no vision for how these different identities and needs will be positively managed - the recent/present history of planning applications in the area (and the failed St Thomas Street Framework) bear witness to this. The characterisation study of 2013 does not appear to have been drawn upon or updated however the council did interpret it in a highly questionable way to justify refusal of the Forum’s application for the extension of the Neighbourhood Area in 2017-2018 which sought to unite areas of shared character and history, appropriate for our emerging policies and to allow residents and businesses in the area to have a stronger voice in the local planning process.

To secure sustainable regeneration the AV.11 area is in need of a planning framework in the creation and development of which the Forum is well placed to play a positive role (also relevant to Matter 10) and there are many positive examples of Opportunity Area Frameworks, Masterplans, SPDs, Planning Frameworks and AAPs in other boroughs. As referred to in other representations, regeneration charters have potential positive aspects but have been in our experience to date problematic in the process of their development e.g. in the mistranslation of research (mirroring the process by which developer led consultations on the St Thomas Street East Framework and the individual applications themselves were not truly reflective of local opinion), have resulted in questionable CIL allocations processes and are too vague to effectively frame development (in themselves, in the way they are referenced in SP2 and when they are rely on other policies in the plan which are currently unsound - for example Tall Buildings). Moreover many major planning applications are proceeding ahead of consultation on the charters - for example on St Thomas Street.

The plan including SP2 does not currently reflect the London Plan in providing sufficient safeguards to ensure that regeneration respects (and builds cohesion through proactive engagement on) the character and heritage of the borough. The Forum assumes this will be the most appropriate to discuss in relation to the St Thomas Street Site Allocations NSP50&51 in Matter 10. SP2 should make direct reference to engagement on local views and the Local List (including the development of social/community value based criteria), to engagement being the basis of comprehensive social infrastructure audits and to demolition of existing fabric being an absolute last resort requiring genuine robust justification (rather than only with regard to significance/setting) to reflect policy on the climate emergency and circular economy principles.