

ST/P7167
25 January 2021

Jacqueline Christie
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Chief Executive Department
Planning Division
London Borough of Southwark
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Dear Ms Christie

New Southwark Plan Examination in Public – London School of Economics and Political Science (LSE) Representation - (Respondent No. NSPPSV411)

Further to the issue by the Inspectors of their Issues and Questions – December 2020 we wish to provide some initial comments on two specific areas of questions raised by the Inspectors.

Policy P5 – Student Homes

We agree that the question raised by the Inspectors in 3.40 is very valid and goes to the heart of LSE's concerns with the wording of Policy P5:

Is the requirement for affordable housing provision sought by the policy justified, consistent with the London Plan and is it viable? Is the level of affordable student accommodation set out in P5(2) justified and in accordance with the London Plan?

The forthcoming adoption of the New London Plan in February 2021 will provide an opportunity for policies on student housing across London Boroughs to be in general accordance with Policy H15 (or Policy H16) of the New London Plan, in order to ensure a consistent approach to policy throughout London. Where a London Borough such as the London Borough of Southwark applies wholly differing policies such as Policy P5 to the New London Plan (and the policies of adjoining boroughs) there should be strong justifiable evidence as to why this departure should occur. It is the LSE's opinion that this has not been demonstrated by London Borough of Southwark.

We would recommend a further question or matter be added which further assesses the wording of Policy P5. This would be to focus on the difference between direct let schemes (i.e. those schemes where a student enters into contract directly with a provider) and nominations schemes (where a University takes nominations for beds and manages the letting of these). A nomination scheme is substantially more affordable for students and often developed by a University. The Council through Policy P5 applies a three tier system unlike any other borough where 'affordable' nominated schemes, 'non-affordable' nominated schemes and direct let schemes are all dealt with slightly differently.

These restrictions impact greatly on the ability of LSE and other universities to develop schemes on

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sites in the borough and make them not able to compete with direct let schemes which can charge substantially greater rents to cover the financial S106 Obligations.

Policy P21 Borough Views

LSE further supports the questions raised by the Inspectors in regard to Policy P21 with reference to Borough View 5 and the methodology undertaken to support the Borough Views set out in Annex 1.

In response to the Inspectors comments in paragraph 8.18:

Is the approach to Borough View 5 from the Millennium Bridge towards the Tate Modern justified, effective and consistent with the London View Management Framework? Are there consequences for the delivery of the plan's growth proposals for this part of the Borough (such as Bankside and Borough and Blackfriars Road)?

LSE gave broad support to the Council in its most recent iteration of the wording of Policy P21 but considered the word 'must' was to be replaced by 'should' as this was less prescriptive.

However LSE has always queried the impact of Borough View 5 on the opportunity for development in Bankside. During the initial discussions with the Council regarding possible redevelopment opportunities for its Bankside House student residence, LSE expressed a concern that the imposition of the Borough View from the centre of the Bridge could have serious consequences on future development of its own site and other sites to the south. Initial height and massing studies demonstrated the imposition of this view policy would result in the loss of c.500 study bedrooms on the LSE site alone. The current wording in the Policy does allow an opportunity for a balanced approach to be taken but still focusses primarily on the protection of the skyline of Tate Modern. As noted below in response to 8.19 the arbitrary nature of the viewing point further accentuates this concern as the approach is not in accordance with that taken on the LVMF.

We consider the Council should respond on the impact Borough View 5 could have on the deliverability of development schemes in the immediate vicinity of Tate Modern and the balance that needs to be made between protecting the profile of a non designated heritage asset and restricting growth opportunities.

In respect of the question at paragraph 8.19:

Are the details in Annex 1 on 'Borough Views' soundly based?

The advice presented on behalf of LSE from Dr Chris Miele of Montagu Evans for a representation by LSE on an earlier version of the New Southwark Plan (May 2019) was that there was a clear lack of consistency between the wording of the policy and the wording within the Annex and the relative moderate status of the view in the hierarchy of townscape views in the Plan. 2. The location of Borough View 5 in Annex 1 should be treated as a series of viewpoint locations along the bridge (within the Council's boundary) rather than an arbitrary point on the edge of the borough boundary. A series of viewpoint locations would provide more realistic representations of the views experienced walking along the Millennium Bridge.

Dr Miele's concerns regarding the approach to methodology undertaken in assessing the view locations and how the hierarchy of views was established in regard to the guidance on views was set

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out in detail in his report dated May 2019. He summarised that the inclusion of View 5 was:

- Disproportion in its substance, and in seeking to impose stricter standards than apply to St Paul's Cathedral, a grade I listed building of recognised strategic importance'.
- Not consistent with the Framework's advice on non-designated heritage assets.
- Not even consistent with the approach national guidance on the conservation of listed buildings through regulation of development in their setting.
- Not based on any evidence base or selection criteria.
- Leading to conflict with strategic regeneration policy reflected in the area behind the building being designated as an Opportunity Area and so in principle acceptable for tall buildings and other forms of intensive development.

We trust these comments are helpful and we look forward to providing further comments in person at the Examination in Public on Policy P5 and Policy P21 (and Annex 1).

Yours faithfully

Sean Tickle

For and on behalf of
Rolfe Judd Planning Limited