

Statement of Common Ground between LB Southwark and Transport for London

February 2021



Introduction

This Statement of Common Ground (SCG) addresses the strategic matters specific to Southwark and Transport for London.

This SCG has been prepared by Southwark Council in agreement with Transport for London (TfL).

The purpose of the SCG is to document matters affecting both parties how they are being addressed and progress in cooperating to address them.

The original SCG was signed in April 2020 but since that date TfL has responded to the proposed changes to the Submission New Southwark Plan (August 2020). The Mayor of London has also approved the Publication London Plan which is likely to be published and form part of Southwark's Development Plan before the conclusion of the Examination in Public. This updated SCG reflects the position in February 2021.

This SCG ensures that the requirements set out in the National Planning Policy Framework (NPPF) have been met. The NPPF states, *"Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries."*

Southwark and TfL officers have had ongoing dialogue on planning issues for many years. These discussions have informed development of adopted plans and other related documents. Officers from both authorities have an ongoing and close relationship and regularly discuss strategic matters affecting Southwark and the wider Greater London area, including interaction of Southwark policies with wider strategic policies. This has included specific meetings to discuss Southwark's emerging Local Plan each stage of preparation.

Southwark Council engages with other boroughs through regular meetings either between officers or elected members with formalised governance arrangements such as the London Councils Leaders' Committee, Association of London Borough Planning Officers, the Cross River Partnership, the Old Kent Road, New Cross and Lewisham Growth Partnership Board and Old Kent Road Working Group. We also maintain correspondence between planning departments on a variety of issues and projects and organise additional meetings on strategic planning matters when needed.



Figure 1: Location of Southwark within Greater London (indicated in red).

Involved Parties

London Borough of Southwark

Southwark is a densely populated and diverse inner London borough set over almost 30km of land to the south of the River Thames. Home to over 314,000 people. Much of the borough enjoys excellent transport links to the rest of London although Southwark has some areas where there is less public transport connectivity. A lower level of rail provision is particularly apparent along the Old Kent Road corridor. Proposals to extend the Bakerloo line southwards from Elephant and Castle are very welcome as it will improve connectivity in parts of the borough, in particular the Old Kent Road with new travel opportunities and growth in residents and jobs.

The New Southwark Plan (NSP) is due to be adopted in late 2021 and sets out the council's ambitious plans for the borough. We have pledged to deliver 2,355 new homes every year, of which a minimum of 35% will be affordable, and to provide 11,000 new council homes by 2043. We are working hard to develop business, with the aim of creating 47,000 new office jobs over the next 20 years and with 32 hectares of land designated as Strategic Protected Industrial Land and 20 hectares of land as Locally Significant Industrial Sites. In line with recommendations by the Mayor of London, we have also ensured that the environment will remain protected, having put in place actions that will bring about carbon neutrality.

Southwark benefits from four Opportunity Areas (OA) which have significant capacity for development and growth. These are:

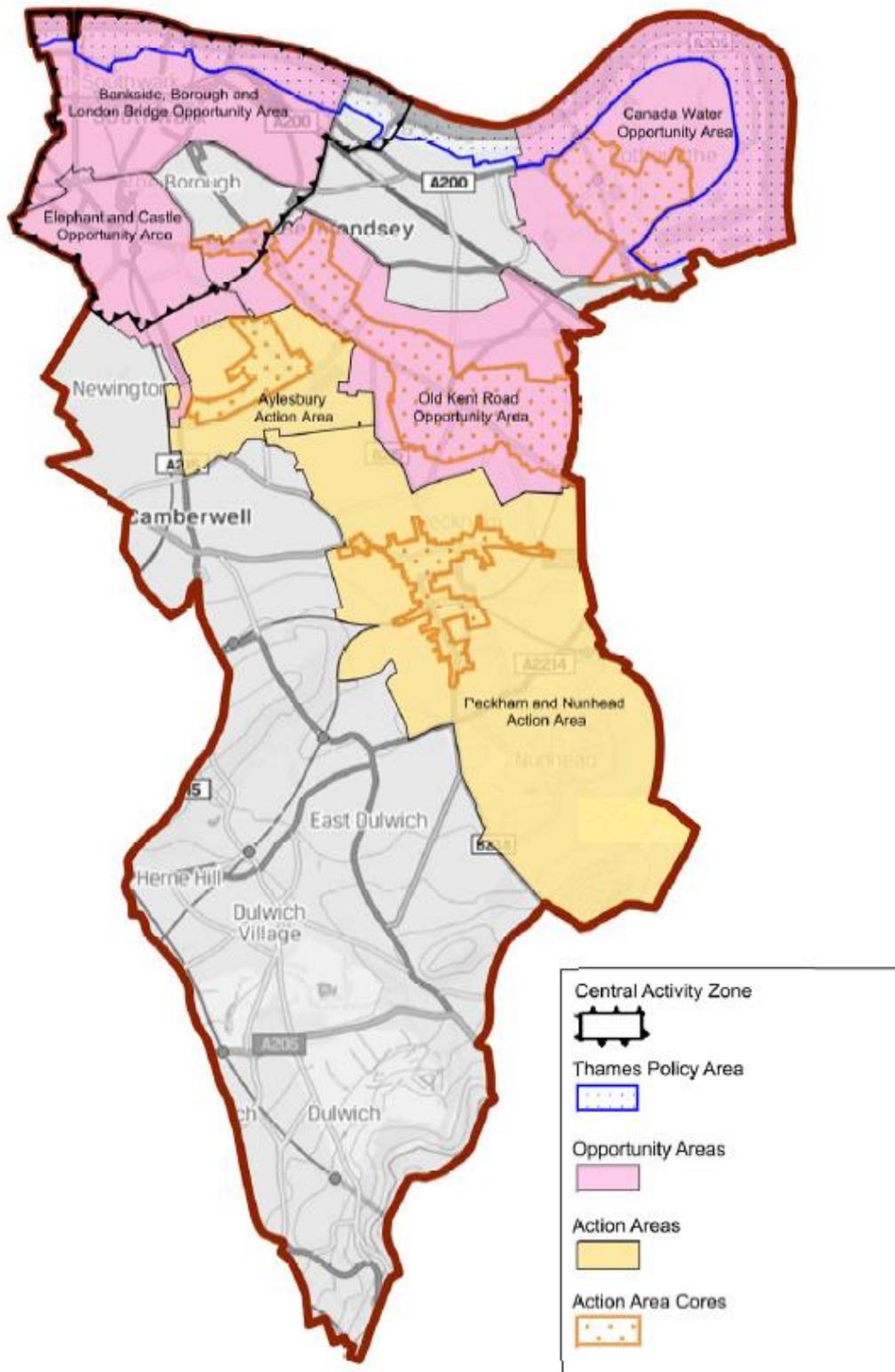
- Canada Water
- Elephant and Castle
- London Bridge, Borough and Bankside
- Old Kent Road.

Southwark also benefits from three Area Action Plans (AAP). These are:

- Canada Water AAP
- Peckham and Nunhead
- Aylesbury AAP.

An AAP for Old Kent Road is also due to be adopted in November 2021. Together, our AAPs are planned to account for an additional 11,400 new homes and 32,000 jobs in the borough.

Southwark is bordered by the London borough of Lewisham to the east, Bromley and Croydon to the south, Lambeth to the west, and the City of London and Tower Hamlets to the north.



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Figure 2: Locations of Action Areas, Opportunity Areas, the Thames Policy Area, and the Central Activities Zone within Southwark.

Transport for London

Transport for London (TfL) is a statutory body created by the Greater London Authority Act. TfL is the integrated transport authority responsible for the public transport system in London and manages London's main roads delivering the Mayor's Transport Strategy. It is a statutory consultee on planning applications, a consultee on others and provides the transport assessment of PSI applications referred to the Mayor.

TfL has responsibility for London's network of main roads as part of the Transport for London Road Network (TLRN), the traffic signal SCOOT system, the London Underground, London Overground, Docklands Light Railway and TfL Rail. It does not control National Rail services in London, however, but does for London's trams, buses and taxis, docked cycle hire, Legible London signs, tunnels beneath the Thames, and for river services. The underlying services are provided by a mixture of wholly owned subsidiary companies (principally London Underground), by private sector franchisees (the remaining rail services, trams and most buses) and by licensees (some buses, taxis and river services).

Policy issues

Movement Plan

The Mayor's Transport Strategy coordinates planning and investment in the transport network across London. We align local funding through the Local Implementation Plan to meet both strategic aims as well as the council's strategies, such as the Movement Plan and supporting Local Implementation Plan 3. Neighbouring boroughs such as Lambeth, Lewisham and Tower Hamlets will experience significant population growth over the same timeframe. This high population growth will put pressure on London's existing and planned transport infrastructure as the rate of investment is highly unlikely to keep pace with the level of demand. This will in turn lead to greater demands on London's and Southwark's surface transport, which includes our streets and public spaces.

Agreements:

- TfL agrees that the Movement Plan is appropriate and in line with the Mayor's Transport Strategy.

Active travel

Policies relating to cycling can be found in the NSP under policy P52. Development must ensure that the delivery of cycle improvements and, that cycle parking is secure and conveniently located, and must contribute to the provision of cycle hire schemes and docking stations where applicable.

TfL has stated that in areas that have larger development sites (such as Canada Water and Old Kent Road), exemplar cycle facilities and ease of access for cyclists will be vital to support the Mayor's mode shift targets towards more active travel.

TfL strongly welcomes the ambition of the cycle parking standards on the whole, though also notes that it is stated that certain cycle parking standards may need reviewing. In some cases, the standards are not in line with the adopted London Plan as the notes in the annex refer to *Gross Internal Area* rather than *Gross External Area*, equivalent to a reduction of 10-15 per cent (apart from where LB Southwark have set a higher requirement). Given the advanced stage of the Publication London Plan, there are also certain standards that are not in line with the latest strategic policy (e.g. short-stay retail). In the consultation report Southwark officers indicate that they would be prepared to accept a direction to amend the standards to accord with the relevant standards in the Publication London Plan. TfL would encourage this to be included in the proposed main modifications.

Agreements:

- Both parties agree that the policies guiding the provision and promotion of cycling facilities in Southwark are generally in line with the approach of the Mayor's Transport Strategy
- Both parties agree that modifications are required to the policy to reflect the Publication New London Plan. These are proposed as modifications in document EIP177 for the Inspectors to consider suggested modifications.

Car Parking

Southwark has a restraint-based approach to car parking, including requiring car-free development in some locations. Southwark's Cycle and car parking standards SPD (2015) sets out the borough's residential car provision for areas based on PTAL and the adopted London Plan recommendations. TfL welcome Southwark's overall approach to parking and will continue to work with the borough to successfully implement it. In particular, TfL has stated strong support for restrictive residential and other car parking standards, particularly requiring 'car-free' residential development well-connected areas with the exception of disabled car parking provision.

However, TfL notes that the likelihood of the NSP needing to be in general conformity with the new London Plan was raised by the GLA in its letter dated 20 May 2019. The draft Plan has now reached an advanced stage in its adoption process, with the Publication Version released which responds to directions from the Secretary of State received by the Mayor. In light of this, TfL considers that the standards set out in Policy P53: Car Parking (see table 1) need updating. TfL understand and welcome that Southwark Council are planning to review all of the policies related to the Carbon Emergency, including car parking, though believe that standards fully in line with the Publication London Plan should be adopted at the earliest possible opportunity, which in TfL's view would be through modifications to the Local Plan as part of the examination process. Therefore, TfL does not accept that all of Southwark's parking standards are in line with policy and objects to aspects of them as currently drafted. In the consultation report Southwark officers indicate that they would be prepared to accept a direction to amend the standards to accord with the relevant standards in the Publication London Plan. TfL would encourage this to be included in the proposed main modifications.

Agreements:

- Both parties agree that the policies guiding car parking in Southwark are in line with the adopted (2016) London Plan.
- Both parties agree that the adoption of a car-free approach to car parking in well-connected locations is necessary within Southwark to avoid the harmful impacts of traffic, to promote the use of sustainable forms of transport and to ensure an efficient use of land.
- Both parties agree that modifications are required to the policy to reflect the Publication New London Plan. These are proposed as modifications in document EIP177 for the Inspectors to consider suggested modifications.

Air Quality

Poor air quality is a major concern for Southwark's residents and is a strategic matter which must be addressed both locally and at a London-wide scale. Southwark and TfL are involved in a number of cross-organisational projects to tackle poor air quality across London; however TfL would welcome further measures to reduce traffic and car ownership in Southwark.

The impacts of construction traffic, including air quality, can cross borough boundaries, therefore Southwark Council is working with TfL, Lambeth, Lewisham, utility providers, developers and contractors to improve logistics and coordination. The NSP contains effective policies to improve air quality and manage the highways' impacts of construction traffic. We will continue to work with partners to ensure that the impacts of construction are mitigated.

Agreements:

- Both parties agree to work collaboratively to ensure that the impacts of development, delivery and management of new developments are minimised and mitigated

Strategic projects

Bakerloo Line Extension

The Bakerloo Line Extension (BLE) is a key element of the growth strategy in the London Plan, which would extend the Bakerloo Line into Southwark and Lewisham (see figure 3). The Mayor of London has committed to its delivery and has agreed with Southwark to phase the delivery of new homes in the area to ensure that existing and newly developed infrastructure is able to keep up with demand. The extension is being progressed through the growth partnership whose members are working together to expedite it. It has been agreed that no more than 9,500 homes will be consented for the Phase 1 development. To support these homes, jobs and services enhancements to the existing public transport network and for active travel will be required prior to the letting of the construction contract for the Bakerloo line extension. The remaining 10,500 homes will be committed to Phase 2 and will be subject to agreement between Southwark Council, the Greater London Authority and Transport for London relating to the status of transport improvements. In December 2020 the Secretary of State for Transport agreed to issue Statutory Safeguarding Directions for the BLE by March 2021.

January 2021 update

The expected phasing plan is contained in Appendix 3 of the NSP Site Allocations Methodology Paper (July 2020) (EIP82). This was the agreed position as of July 2020. Since then some planning applications have changed status, for example they have been approved subject to S106 agreement, or have started construction, and some new planning applications have been submitted. The updated phasing plan agreed as of January 2021 is provided as EIP159. Southwark Council has approved 8,057 homes in Phase 1 as of January 2021.

Agreements:

- Both parties agree to continue cooperating with the GLA and Lewisham to promote the delivery of the BLE.
- Both parties are committed to keeping the consented delivery figures and the information on progress towards consents up to date.
- Both parties agree to the phasing plan outlined above in principle.
- Both parties agree to exploring options to improve bus services and infrastructure including for better rail/tube connectivity and, where necessary to address any disruption caused to travel during the implementation of the BLE as far as reasonably practicable.
- The answers to the Inspector's Matters to Questions 2.15 (AV13 Old Kent Road Area Vision), Question 9.3 relating to the Bakerloo Line Extension and Old Kent Road Healthy High Streets, Question 9.4 and Question 9.5 relating to the Bakerloo Line Extension (Policy IP2 – Transport Infrastructure) have been prepared jointly between the parties.
- Both parties agree that the potential for a station at the Bricklayers Arms site allocation NSP53 should be removed from the site guidance.

London Underground Ticket Hall

The Elephant and Castle ticket hall frequently suffers from overcrowding and often has to shut during rush hour to manage the flow of people in and out of the tube.

As part of the redevelopment of the Elephant and Castle Shopping Centre a new Underground ticket hall with new escalators and station entrance, will be delivered. This will feature step-free access from the street to the platform, making it easier for disabled passengers to use and help those with pushchairs

Agreements:

- Both parties agree to continue cooperate to ensure the timely delivery of the new Elephant & Castle ticket hall.

River crossings and riverboat services

In June 2019, Transport for London (TfL) Board's Programmes and Investment Committee decided to pause development work on the proposal for the Rotherhithe to Canary Wharf walking and cycling bridge due to affordability in light of increased costs and to return to the feasibility stage to consider alternatives. TfL is developing plans for a new ferry service connecting Rotherhithe and Canary Wharf, building on initial feasibility work carried out ahead of the first public consultation on a crossing in November 2018.

Southwark Council have urged TfL to reconsider, as have other organisations.

It is also to be recognised that a large area of the northern part of the borough is in close proximity of River Thames thereby offering opportunity for river travel.

Agreements:

- Both parties agree that there is a high level of demand for a new crossing point between Southwark and Tower Hamlets, as proven through public consultation and emerging growth areas.
- Both parties agree to cooperate in further discussions with the GLA and Tower Hamlets regarding a new ferry service to connect the two boroughs.
- Both parties agree to seek improvements to riverboat services where this can be funded as part of development proposals in the borough.

Opportunity Areas

Old Kent Road

The Old Kent Road Area Action Plan, which covers the Old Kent Road Opportunity Area, is planned to deliver at least 20,000 new homes and 10,000 new jobs. Old Kent Road is a historic key strategic movement corridor from south east London and Kent to central London. It is a TfL road (TLRN) and this makes the OA quite unique in that the TLRN forms the 'spine' of the OA at street level.

TfL has stated that it is fully supportive of the Council's vision to transform the area to a two district town centres and thereby making Old Kent Road a 'high street', in line with the Mayor's 'Healthy Streets' vision. However, a key caveat is that the road will need to maintain its movement function, with particular emphasis on pedestrians, cyclists, buses but also for freight. It has been agreed that there must be a clear cap on development until there is a level of certainty over delivery of the BLE, and that funding must be recognised as an issue.

Agreements:

- Southwark agrees that phasing of development on the Old Kent Road will be as agreed with TfL and the GLA.
- Both parties agree to work together to safeguard land required to deliver the BLE
- Both parties agree to work together to seek s106 funding/land to deliver interim transport capacity improvements in advance of BLE such as Healthy Streets improvements, bus enhancements and cycle hire

Canada Water

The Canada Water Area Action Plan, which covers the Canada Water town centre is planned for 5,000 new homes and 2,000 jobs alongside a redeveloped shopping centre and the Harmsworth Quays print works. This area is well connected by public transport, with excellent links by the underground, overground and the bus network. Improvements to local walking, cycling and bus access will help to further improve access to the public transport network.

Agreements:

- Both parties agree to work collaboratively where possible to deliver the transport infrastructure and services to support the regeneration of Canada Water, funded by development where appropriate.

Site Allocations

NSP25/NSP26/NSP71

TfL has some remaining concerns about sites NSP25, NSP26 and NSP71 and feel the proposed modifications do not fully address these concerns. In TfL's view, these sites allocations need to take fuller account of the need to safeguard existing land and buildings used for public transport, active travel or related support functions in line with policy T3 of the London Plan. TfL's view is that the wording of the site allocations needs to do more to require the retention of bus capacity to maintain the local bus network, or to secure suitable alternative arrangements agreed with TfL prior to any redevelopment. Both parties are currently collaborating on the requirements for bus station capacity at the Aylesham Centre (NSP71) and discussions are ongoing with the developer of the site.

Agreements:

- Both parties agree to continue to work collaboratively to ensure that bus capacity is retained for the local network.

- Both parties suggest to the Inspectors the following amendments to the site allocations NSP25, NSP26 and NSP71 which would address these concerns:

NSP71

Policy

~~Retain the bus station capacity if the use is still required. If the bus station is surplus to requirements, the equivalent space should be provided as small business space (B use class).~~

D&A guidance

~~Redevelopment should maximise opportunities to improve links across the site, provide new civic space and connect to the existing road and public realm layout, whilst retaining bus station capacity provision on the site if that use is still required. If the bus garage is required redevelopment should consider over the station development to provide new homes.~~

NSP25 – Camberwell Bus Garage

Policy

~~Retain bus capacity for the local network. Retain the bus garage if the use is still required.~~

D&A guidance

~~If the bus garage is required redevelopment should consider over the station development to provide new homes.~~

NSP26 – Abellio Walworth Depot

Policy

~~Retain bus capacity for the local network. Retain a bus garage if the use is still required.~~

D&A guidance

~~If the bus garage is required redevelopment should consider over the station development to provide new homes.~~

Governance Arrangements

Timetable for agreement, review and update

This statement has been informed by on-going engagement between Southwark and TfL.

This SCG will be a live document and will be reviewed on a regular basis, informed by continued communication between the parties through one to one meetings, group meetings (such as Association of London Borough Planning Officers), consultation events at key plan making stages, and electronic communication.

The current Southwark Plan was adopted in 2011. The New Southwark Plan was submitted in January 2020 and the Examination in Public date is being set by the Inspector. In producing the Submission Version of the New Southwark Plan, we have given increased weight to the emerging London Plan policies.

Southwark received comments on 27 February 2018 from the TfL City Planning team and the TfL Commercial Development team concerning the Proposed Submission Version of the NSP. These comments have been taken into account by planning officers in revising the submission version of the NSP and the full responses from officers can be found in Appendix 1. TfL provided a further response dated 26 October 2020 in response to consultation on proposed modifications to the Proposed Submission version of the NSP.

The Mayor's Transport Strategy was adopted in 2018.

The Publication version of the London Plan was approved by the Mayor and released in December 2020 and is expected to be adopted before the conclusion of the EiP.

Preparation of this SCG

This is the first SCG to be prepared to support a local plan in Southwark. The timeline of its creation is set out below:

- First draft prepared in September 2019 by Southwark Council.
- Draft shared with neighbouring authorities for comment during late September and early October 2019.
- Sign off process instigated in November 2019.
- Submitted as part of the New Southwark Plan in April 2020
- Updated in February 2021.

Sign-off Process

Those responsible for the management and sign off of this document are:

Organisation	Officer lead	Senior or political approval of the SOCG	Sign off
London Borough of Southwark	Planning Policy Manager	Director of Planning	Director of Planning – Simon Bevan

Transport for London		London Plan and Planning Obligations Manager	Josephine Vos, London Plan and Planning Obligations Manager
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Table 2: Sign-off details.

Signatories

We agree that this statement is an accurate representation of matters discussed and issues agreed upon.

It is agreed that these discussions will inform both the New Southwark Plan and other Local Plans and all authorities will continue to work together collaboratively in order to meet the duty to cooperate.

Signed: _____

Name: Simon Bevan
Position: Director of Planning

London Borough of Southwark

Signed: _____

Name: Josephine Vos
Position: London Plan and Planning Obligations Manager

Transport for London

Appendix 1

Consultation on the New Southwark Plan Proposed Submission Version

TfL has previously made representations in respect of earlier versions of the evolving Plan at the following stages:

- Preferred Options consultation (letter 1 December 2016)
- Area Visions and Site Allocations consultation (letter 27 April 2017)
- New and Amended Preferred Options Policies (letter 13 September 2017)
- Informal consultation on preferred version (letter 27 November 2017)
- Reg. 19 Proposed Submission Version consultation (letter 27 February 2018)
 - Amended Policies Proposed Submission version consultation (May 2019)
 - Proposed Modifications to Submission version consultation (October 2020)