

Statement of Common Ground between Southwark Council and Richard Lee (part 2 – site allocations)

March 2021



Introduction

This Statement of Common Ground (SCG) addresses matters specific to Southwark Council and (insert name here) which relate to the Proposed Modifications for Examination Version of the New Southwark Plan.

This SCG has been prepared by Southwark Council in agreement with Richard Lee and will be used to inform the contents of the New Southwark Plan.

The purpose of the SCG is for both parties to acknowledge areas of common or uncommon ground relating to the contents of the New Southwark Plan, and to progress in cooperating on the best approach to addressing these areas.

Southwark Council

Southwark Council is the local authority for the London Borough of Southwark in Greater London, England.

Richard Lee

Richard is an individual representative, a resident of Southwark and active in several local community organisations.

Strategic Matters

(Please use this section to provide details of matters relating to specific policies, Area Visions, or site allocations. You may include as many strategic matters as is relevant.)

1. Aylesbury Area Vision

Mr Lee

Aylesbury area vision should emphasise the role of social rented housing, alignment with Aylesbury Area Action Plan, application of Social Regeneration Charter principles/ indicators and recognition of play space.

The plan for the provision of further rented homes on so called “brownfield land” is not clear or robust. The Plan is confusing and could have at least more than one meaning. Therefore this part of the NSP is not positively prepared. It is unjustified, unsound and ineffective. This section should be deleted. The use of the term “brownfield land” is pejorative and it does not take into account the presence of residents and undermine our rights to occupy the land.

The Aylesbury Area Vision Map was modified half way through the consultation period, this means that the plan is unsound. As a council tenant I support the provision of more social rented homes. I believe that the council should commit to the NSP to provide “council homes”.

Agreements:

- Brownfield land has been removed in previous version of the New Southwark Plan from the Aylesbury Area Vision.
- The Pre-Engagement Plan, this already includes a fact-based audit of the area, this has been set out in the Monitoring Framework as a validation requirement.
- The boundary for the Aylesbury Area Vision is the footprint of the Aylesbury Action Area Core and has been set out in the updated EIP158.
- Proposed Minor modifications to the Aylesbury Area Vision:

Under The Aylesbury Area is:

Add to the end of bullet point one now at the end of their service life, but which were valued by residents for the number of social rent units and the larger flats and room sizes. They are set amongst mature trees, green and open spaces and play space.

Under Growth opportunities in the Aylesbury Area, the proposed minor modifications as set out below:

This suggests that it would now be appropriate to consider an increased number of homes within the land covered by the Area Action CorePlan boundary, replacing all the existing social rent homes within the footprint of the original estate. Irrespective of density, the social rented and intermediate homes should be met with a preference for social rented housing in accordance with Policy P1.

Under Development in the Aylesbury area should:

Deliver homes and a wider urban environmentand a choice of homes, with a priority to high quality social rented housing, including a range of different sized homes.....

Disagreements:

Mr Lee wishes Policy P1 to refer to the Aylesbury development providing at least 60% social rented and intermediate housing, made up of at least 75% social rented. The wording is in P1 so the council does not consider repeating this in the vision to be necessary.

The insertion of wording to ensure the priority of social rented housing and the re-provision of green space and play space are included in the development. Development in the Aylesbury area should:

Re-provide and enhance play spaces and publicly accessible green spaces to deliver healthy and sustainable neighbourhoods.

The Council sees this as a policy rather than a vision.

Council Response

The changes proposed bring forward policy from the AAP. The proposed minor modifications above provide clarity and bring in aspects that are required for soundness.

This boundary has been updated in EIP158.

The above boundary has been added to reflect the AAP more clearly to reach the number of homes that will be delivered as set out in the AAP.

It builds upon previous conversation with local residents on what they have valued within the Aylesbury Estate which includes green and open space, the number of social rent units and the size of rooms and units.

2. London Bridge Area Vision

Mr Lee

London Bridge area vision should be in alignment with Social Regeneration Charter for St Thomas Street, need for a planning framework and to mention Old Bermondsey Neighbourhood Plan (emerging), responding to new circumstances of Covid.

The change makes clear that this site will impact on significant local green space at Guy Street Park, an important part of the local character of the area.

The site map is wrong to point to an improvement in pedestrian connectivity when many local residents do not walk on the street, but prefer to use the green corridor from Leathermarket Gardens to Guy Street Park. The 2 gardens together make up a fantastic green space, where you do not feel hemmed in by tall buildings at the moment. There has been a lack of consultation with local people, in terms of what we want for the area, and not considering alternative options proposed by the Old Bermondsey Neighbourhood Plan which proposes a height limit.

Agreements:

- The NSP will be updated to refer to the Old Bermondsey Village Neighbourhood Plan once this Neighbourhood Plan is adopted.
- The boundary of the vision areas are set out in the policies map on page 21 of the plan and are being proposed for main modifications. The zoomed in detailed map for the London Bridge area will include the Area Vision Map on page 63 with this boundary:
Starting at the river the boundary goes east to Tower Bridge Road. The boundary continues down Tower Bridge Road along to Bricklayers Arms Roundabout at the end of the Old Kent Road. Then the boundary continues along New Kent Road to Elephant and Castle Roundabout and then continues north up Borough High Street to the river.
- The area vision map will indicate the neighbourhood forum area.
- The black dotted line does not go through the park as this is a cycle route, and does not show connectivity.
- Include the proposed wording to reference the aims of the Old Bermondsey Neighbourhood Forum under 'Development in London Bridge should...'
- Insertion of the below:

Preserve and improve the existing identities ensuring that the history and architectural wealth that comes from previous generations of residents is retained in the Old Bermondsey Village Forum Neighbourhood Area. This would be for both the Bermondsey Street Conservation Area and the surrounding housing estates mainly built between 1900 and 1950. Along with the network of local streets and yards where commercial uses are intertwined with residential buildings.

Disagreements

Mr Lee

The Old Bermondsey Neighbourhood Forum Area has building heights significantly lower than at London Bridge station and Tooley Street.

Include the proposed wording below to reference the goals of the St. Thomas Street London Bridge Social Regeneration Charter. *Development in London Bridge should:*

- Create opportunities for young people, by investing in existing and new facilities and programmes
- Bring communities together by investment in existing and new community space
- Build more council homes and invest in estate improvement plans
- Ensure residents can access good quality employment opportunities locally
- Improve the environment and air quality across the area

Include the proposed wording below to reference the vision of the Social Regeneration Charter. Under *Growth opportunities in London Bridge* insert:

New developments will improve the life chances and well-being of local people, creating better community amenities, access to high quality enrichment and recreation activities, and a range of employment and training opportunities.

Include the proposed wording below to reference the need for a planning framework. Under *Growth opportunities in London Bridge* insert:

A London Bridge Planning Framework will be prepared by the Old Bermondsey Neighbourhood Forum in cooperation with the Council and other key stakeholders.

Council Response

- There are policies already in the plan to address the above, it is not unique to London Bridge.
- The Social Regeneration Charter indicators (including the London Bridge Social Regeneration Charter Indicators) have been included in the monitoring framework for the NSP.
- Team London Bridge have prepared a framework for London Bridge area. Old Bermondsey Village Neighbourhood Forum are preparing a neighbourhood plan for their area. The Council works with both groups. The Council does not consider a planning framework to be necessary at this point for London Bridge. This is under continuous review and an Opportunity Area Framework would be prepared with the GLA if this is considered helpful for development.

3. London Bridge Site Allocations

Mr Lee

For Site allocations NSP49, NSP50, NSP51 - need for further categories when assessing the sites (Climate Emergency, Social Regeneration Charter, fact-based audit - Development Charter), higher priority to local heritage and to council housing (Great Estates), higher protection of green space.

The site allocations for London Bridge are flawed (and unsound) because of the absence of a planning framework, to specify how the Opportunity Area can be developed, how key development sites fit within a policy context, and to build consensus between stakeholders.

This amounts to a significant barrier to bringing forward development, as a consideration of the planning applications for these sites shows. B1 office demand should be given equal weight to housing – B1 demand is changing.

The Old Bermondsey Neighbourhood Plan is a missing reference in the site allocation and a draft neighbourhood plan should be included in the examination library.

The draft London Bridge/ Borough and Bankside SPD was agreed by the Council for public consultation in 2010 but never adopted.

To make the vision and site allocations sound, a main modification is needed to put in place a London Bridge Planning Framework, prepared by the Old Bermondsey Neighbourhood Forum and Southwark Council working in collaboration with an up to date evidence base.

Sites 50 and 51 have faced considerable uncertainty arising from the absence of a planning framework. The site allocations wording seems to follow the above planning applications in not reflecting the importance of local heritage (even though this is emphasised in the London Bridge Area Vision).

The priorities of the Social Regeneration Charter (build shared amenities and affordable housing, improve local employment opportunities, provide opportunities for recreation and healthier lifestyles, create opportunities for young people) should also be reflected in the site allocations. I would like to request that the Charter and the Social Life Baseline Study are included in the examination library.

Applying the criteria of Climate Emergency mitigation and adaptation is also highly significant. Site allocations 50 and 51 are based on demolition, whereas the retention of heritage buildings would meet the paramount need to reduce carbon emissions.

Council Response

Mixed use development is encouraged in London Bridge. Offices are a required use in the CAZ, and housing is also able to come forward on these sites.

Local heritage is identified in the site description of the site allocations.

The Council is starting a Planning Framework with Guys and St Thomas on NSP49. This will not be included in the Plan.

Melior Street Community is protected as Other Open Space.

Agreements:

- The Development Consultation Charter has been updated to include a requirement for a Pre-Engagement Plan, this already includes a fact based audit of the area. This will be set out in the Monitoring Framework.
- The Social Life Research and Social Regeneration Charters have been added as an appendix to your hearing statement, as agreed by inspectors.
- New categories to the site allocations table, particularly for the Climate Emergency will be considered as part of the early review.
- Once adopted the Old Bermondsey Neighbourhood Plan will form a part of the development plan in Southwark and will be referenced in the vision in the same way as SOWN.

Disagreements

The site allocation tables for London Bridge sites to be amended by inserting the following wording:

Under approach to tall buildings – identify those parts of the site that are not appropriate for tall buildings and set a height limit

Under site requirements – redevelopment must provide social rented homes, affordable workspace and new green space (eg by extending Melior Street Garden)

Under Is it an Opportunity Area – a planning framework for the Opportunity Area is being prepared by the Council in cooperation with Old Bermondsey Neighbourhood Forum

Under Impacts a designated open space – Melior Street Community Garden will be retained and extended

Council Response

- London Bridge is identified in P16 Tall buildings to be appropriate for tall buildings. The height and layout will be considered as part of the planning application as set out in P16.
- With regard to climate emergency and site allocations, this will be reviewed as part of the early review. This is not an issue of soundness as policies relating to climate change are applied to development within site allocations.

Signatories

This statement has been informed by engagement between Southwark Council and Richard Lee.

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

It is agreed that these discussions will inform the New Southwark Plan and that both parties will continue to work together collaboratively in order to meet the duty to cooperate.’

Signed: *Richard Lee*

Name: Richard Lee

Position: Individual

Date: 6th April 2021

Signed: 

Name: Simon Bevan

Position: Director of Planning

Date: 6 April 2021