

New Southwark Plan Proposed Submission



Version:

Duty to Cooperate Statement

1 Introduction

New Southwark Plan

- 1.1 The New Southwark Plan (NSP) will be the regeneration strategy and development plan (along with the London Plan) for Southwark. The final NSP will replace the saved policies of the Southwark Plan 2007 and the Core Strategy 2011 and will be used to set out the council's aspirations for regeneration and to make decisions on planning applications. The preparation has involved open consultation since October 2013 with many versions being subject to considerable meaningful discussion with residents, businesses, landowners, developers and other public bodies.
- 1.2 The NSP has been prepared with full regard to the adopted London Plan 2016 and joint work on the emerging new London Plan. The London Plan is legally part of each of London's local planning authorities' development plan and must be taken into account when planning decisions are taken in any part of London. The London Plan provides the strategic, London-wide policy context for borough local development plan documents (DPD); all local DPDs and Neighbourhood Plans have to be 'in general conformity' with the London Plan.
- 1.3 The NSP is currently at the Proposed Submission Version stage and is the subject of consultation. Several stages of consultation have already been undertaken for the NSP. Between November 2013 and March 2014 the council carried out an informal stage of consultation through a survey focused on the borough's high streets. The Issues and Options version of the NSP was consulted on from October 2014 to March 2015. This version of the plan set out early draft policies and area visions. Between October 2015 and February 2016 the council consulted on the Preferred Option draft of the policies of the NSP. The Area Visions and Site Allocations consultation formed the second part of the Preferred Option stage and was consulted on from February to July 2017. Since the close of these consultations, the council has had the opportunity to review the responses received and produced a set of New and Amended policies which was consulted on in an 'interim' consultation from June to September 2017.

Cooperation on strategic matters

- 1.4 We have been working in partnership with London boroughs, the Mayor of London and other public bodies to cooperate on planning matters that cross borough boundaries. We do this so that we can align our planning policies and regeneration

activities to get the best outcomes from development for Southwark's residents and businesses as well as those of our neighbours. This ongoing work has informed each version of the NSP. Since 2011 this approach to engagement has also been required under law.

- 1.5 The Localism Act 2011 amended the Planning and Compulsory Purchase Act 2004, by inserting a new legal requirement referred to as the 'Duty to Co-operate'. The Duty to Co-operate places a legal duty on local planning authorities, county councils in England and other prescribed bodies engage constructively, actively and on an ongoing basis to develop DPDs, including activities that prepare the way or support the activities of preparing DPDs, in respect of strategic matters.
- 1.6 The Duty to Co-operate specifically relates to 'strategic matters' which are defined as: sustainable development or use of land that has or would have a significant impact on at least two planning areas, in particular in connection with sustainable development or use of land for or in connection with strategic infrastructure which has or would have a significant impact on at least two planning areas.
- 1.7 Paragraph 156 of the National Planning Policy Framework (NPPF) also outlines strategic priorities that a local plan should have strategic policies to cover. They include:
 - The homes and jobs needed in the area;
 - The provision of retail, leisure and other commercial development;
 - The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and the provision of minerals and energy (including heat);
 - The provision of health, security, community and cultural infrastructure and other local facilities; and
 - Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
- 1.8 In accordance with the NPPF (paragraph 159), public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out above.
- 1.9 The NPPF (paragraph 179) also highlights the need for local planning authorities to work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and are reflected in individual local plans. Joint working should allow local planning authorities to work together to meet development requirements that cannot be wholly met within a single local planning area. Local planning authorities should also take account of different geographic areas, including travel-to-work areas. Local planning authorities should work collaboratively on strategic planning priorities to enable delivery of sustainable development and infrastructure (paragraphs 162 and 180).
- 1.10 Cooperation should be a continuous process of engagement, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development. Local planning authorities are expected to demonstrate evidence of having effectively co-operated

to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This evidence could include plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy. A Planning Inspector can consider whether this duty has been complied with in the examination of planning documents.

1.11 The preparation of Local Plans is governed by the Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended). This sets out a list of prescribed bodies that the Duty to Co-operate applies to, which includes:

- the Environment Agency
- the Historic Buildings and Monuments Commission for England (known as Historic England)
- Natural England
- the Mayor of London
- the Civil Aviation Authority
- the Homes and Communities Agency
- each clinical commissioning group established under section 14D of the National Health Service Act 2006
- the National Health Service Commissioning Board
- the Office of Rail Regulation
- Transport for London (TfL)
- each Integrated Transport Authority
- each highway authority within the meaning of section 1 of the Highways Act 1980 (including the Secretary of State, where the Secretary of State is the highways authority)
- the Marine Management Organisation.

1.12 As advised in the Planning Practice Guidance, the duty to cooperate is not a duty to agree. However, local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination.

1.13 Within London, the Planning Practice Guidance states that the degree of cooperation needed between boroughs will depend on the extent to which strategic issues have already been addressed in the London Plan.

Evidence of cooperation

1.14 The purpose of this paper is to provide information on the constructive, active and continuous process of engagement which has underpinned the preparation of the NSP.

1.15 Section 2 sets out how we have engaged and cooperated with planning authorities neighbouring Southwark and across London, the Mayor of London and other

prescribed bodies. It also sets out how we have had regard to the local enterprise partnership and the local nature partnership.

1.16 Section 3 explains how strategic cooperation has resulted in effective and deliverable policies on cross-boundary matters.

1.17 Section 4 concludes on compliance with the legal duty.

2 Engagement under the Duty

2.1 The council has made every effort to secure the necessary cooperation on strategic cross boundary matters before submitting the NSP for examination through active and sustained engagement from the outset of plan preparation. This has gone beyond formal consultation to include regular meetings, involvement in the preparation of joint evidence base, and early and ongoing discussions on policy development and to share findings from partners' emerging evidence base.

2.2 Co-operation arrangements have provided both formal and informal opportunities for our partners and prescribed bodies to input and comment on aspects of the NSP approach and evidence base. The consultation report published alongside the NSP provides an overall picture of formal consultation carried out that has included the prescribed bodies and explains how matters raised through consultation have been taken onto account. The consultation report provides a response to each point raised and identifies how these views have been taken into consideration and whether a change has been made to the NSP as a result. Where any matter raised has not resulted in a change the reason for this is also set out.

2.3 Many of the strategic matters and key issues to be addressed through compliance with the Duty to Co-operate are, in London, a matter for The London Plan or are otherwise addressed through the preparation of the London Plan. This includes the overall amount of housing to be provided for London, borough by borough.

2.4 The adopted London Plan has been prepared and amended as follows:

2011 The London Plan was formally published.

2013 Revised Early Minor Alterations to the London Plan were formally published – the minor alterations sought to ensure consistency with the NPPF and arrangements for the newly introduced 'affordable rent' housing product.

2015 Further Alterations to the London Plan were formally published – the further alterations sought to incorporate up-to-date estimates of housing need and housing land availability and new (higher) affordable housing targets. The London Plan 2015 was published, consolidating the 2011 Plan with all subsequent alterations.

2016 Minor Alterations to the London Plan were formally published – this took the form of two documents, one taking forward the government's new technical housing standards, and one reviewing residential parking standards in parts of outer London with low public transport accessibility.

2.5 The London Plan 2016 was published in March 2016 consolidating all the subsequent alterations to the 2011 London Plan. It provides the strategic framework for the whole of London and sets out objectives for strategic issues such as:

- the homes and jobs needed;
 - the location and provision of retail and employment development;
 - how growth will be supported and managed;
 - the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, and energy (including heat);
 - the provision of social infrastructure and other local facilities; and
 - climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
- 2.6 The London Plan identifies Southwark as an inner London authority and part of South London. The London Plan sets a housing target for each borough as well as Strategic Industrial Locations and Opportunity Areas which indicate jobs and housing targets.
- 2.7 The London Plan is being reviewed by the Mayor of London. A new draft London Plan was published for public consultation in December 2017. We have engaged in joint working on the evidence base behind the new plan. We have prepared the NSP to respond to this evidence and achieve conformity on strategic matters. Further details on how we have engaged in joint working are given below. Dates for key meetings are given in Appendix 1.

Neighbouring authorities

- 2.8 Southwark is bordered by the London boroughs of Lewisham and Bromley to the east, Lambeth to the west and the City of London and Tower Hamlets to the north. Southwark is part of a sub-regional grouping of south-east London boroughs for strategic planning purposes with Lewisham, Greenwich, Bexley and Bromley.
- Southwark
- 2.9 We engage with other boroughs and the City of London 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 and the South East London Duty to Cooperate 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.
- 2.10 The Association of London Borough Planning Officers is a London-wide forum for the discussion of strategic issues and includes updates from each authority on key work, which may have cross boundary implications. In addition to all London boroughs these meetings include the Greater London Authority (GLA) and the London Government Association. Meetings involve updates on each council's local plan progress and discussions on updated evidence documents and relevant cross boundary issues. Strategic matters including the overall approach to housing, and affordable housing are discussed as well as alterations to the London Plan, changes to national planning policy and legislation.
- 2.11 Southwark is a member of sub-regional partnerships and working groups, which address cross border strategic matters. These include the South East London

Housing Partnership and the East and South East London Sub-regional Transport Panel. During the preparation of the Local Plan, Southwark has been working with its London neighbours and the GLA through the South East London Joint Waste Group (SELJWG). The group is chaired by the London Borough of Bexley.

- 2.12 The Cross River Partnership board includes Southwark, Lambeth, City of London and Westminster councils as well as central London business improvement districts and other stakeholders. The board coordinates planning, transport and economic development projects and has been in place since the 1990s.
- 2.13 We have worked intensively with neighbouring boroughs on key cross-boundary projects and areas of growth. Examples include coordination to oversee construction of the Blackfriars Road Boulevard between 2014 and 2016 and delivering the Low Line project with Lambeth and Network Rail. Planning for growth associated with the Bakerloo Line extension has involved ongoing work with Lewisham on both a strategic board and in a working group.
- 2.14 On a regional scale the 156 authorities and 11 Local Enterprise Partnerships within London, the South East and East of England are working together to coordinate strategic policy and infrastructure investment more effectively to underpin economic prosperity across the Wider South East. South East and East of England Leaders have been meeting informally with the London Deputy Mayor for Planning to discuss common strategic planning and economic growth issues supported by an officer group.

Prescribed bodies

- 2.15 Prescribed bodies have been engaged at each stage of formal consultation on the NSP. Representations received at each stage have informed the next draft of the plan. We have also engaged prescribed bodies in joint-working around a shared evidence base as well as key growth projects for matters of strategic interest to public bodies.
- 2.16 Cooperation with TfL and the GLA has been extensive to ensure plans and infrastructure projects deliver the aspirations of Southwark and of the Mayor of London. Southwark has actively participated in the preparation and review of the London Plan and the Mayor's other strategies. This has included input to the London strategic housing market and strategic housing land availability assessments, town centre health checks and the London employment sites database.
- 2.17 We have worked closely with the GLA and TfL to bring forward some of London's most significant regeneration and growth in opportunity areas at Elephant and Castle; Bankside, Borough and London Bridge; Canada Water and most recently at Old Kent Road. This has involved matching largescale development at the planning stage with infrastructure, supporting the growth of the central London economy and delivering new homes in revitalised neighbourhoods that offer services and an attractive environment for residents. It has also involved ongoing cooperation on implementation, as with the Bankside, Borough and London Bridge Opportunity Area logistics group. The group facilitates bi-monthly coordination with all contractors in the opportunity area plus statutory authorities including business improvement districts, Lambeth and Southwark councils and TfL.

- 2.18 We have formed the Old Kent Road, New Cross and Lewisham Growth Partnership for the regeneration of areas associated with the Bakerloo Line Extension. This includes the Old Kent Road Opportunity Area and part of the Lewisham, Catford and New Cross Opportunity Area in Lewisham borough. The partnership consists of Southwark and Lewisham boroughs, TfL and the GLA. The purpose of the growth partnership is to ensure a consistent and streamlined approach that accelerates the delivery of comprehensive, place specific and high quality regeneration across the corridor and surrounding areas. The partnership is responsible for leadership, cross agency working, funding, planning policy, good design and delivery.
- 2.19 NHS Southwark Clinical Commissioning Group (CCG) is another key partner, working with the council to ensure that development improves health services and health outcomes for Southwark's residents. Under the Health and Social Care Act (2012) Health and Wellbeing Boards were set up to improve integration between practitioners in local health care, social care, public health and related public services. The board includes the CCG and is responsible for producing:
- Joint Strategic Needs Assessment (JSNA) providing local policy-makers and commissioners with a profile of the health and wellbeing needs of the local population and
 - Joint Health and Wellbeing Strategy, based on the priority areas identified in JSNAs
- 2.20 Work with the CCG has also included the development of an estates strategy for primary and community healthcare facilities in the borough. The estates strategy underpins the approach to meeting health service needs in the NSP.
- 2.21 Other prescribed bodies have helped to contribute to the NSP evidence base on strategic matters. The Environment Agency was engaged during the preparation of the Southwark Strategic Flood Risk Assessment. Historic England has added to the local historic environment evidence base over the years, particularly in relation to designated assets. Some prescribed bodies have been consulted but not raised strategic issues for further discussion.

Local Enterprise Partnership and Local Nature Partnership

- 2.22 Although Local Enterprise Panels and Local Nature partnerships themselves are not subject to the duty to co-operate requirements, local planning authorities must co-operate with them and should have regard to their activities where relevant to plan making.
- 2.23 The London Enterprise Panel (LEP) is the local enterprise partnership for London and is governed by the Mayor of London. It is the body through which the Mayor of London works with boroughs, business and TfL to take a strategic view of the regeneration, employment and skills agenda for London. Boroughs have historically engaged with the Mayor of London / GLA rather than directly with the LEP on relevant strategic planning matters. Southwark has effectively co-operated with the GLA regarding the development of its evidence base particularly in relation to business needs and likely changes in the market
- 2.24 The 'All London Green Grid partnership' is recognised by DEFRA as the Local Nature Partnership for London. The partnership does not yet have a governance structure that allows it to respond on matters of local plan consultations. Policies to

protect and restore the natural environment in the NSP are in general conformity with the London Plan. We have engaged with the London Wildlife Trust and local wildlife groups through the Southwark Biodiversity Partnership throughout the preparation of the NSP.

3 Outcomes for strategic cross boundary matters

3.1 Through the ongoing and constructive engagement outlined above we have cooperated with our neighbours and other public bodies to produce effective and deliverable policies on strategic cross boundary matters. To a large extent this has been achieved through joint working on the preparation, implementation and review of the London Plan. Further details are given below on the outcomes for cross-boundary planning within the NSP. During the preparation of the NSP we have explored all available options to align the plan with our neighbours.

Natural and historic environment

3.2 The Environment Agency's Thames Estuary Plan 2100 sets out the measures that will be required to be implemented to maintain adequate flood risk protection from the River Thames by the year 2100, taking into account the impacts of climate change, increased rainfall and rising sea levels. The plan advises that by 2065, the existing flood defences of the river wall running from Bankside to Rotherhithe will need to be raised by 0.5m and a further 0.5m by 2100. This will block the eye level views from the current Thames path. However, by setting development back from the river frontage there are significant opportunities to enhance the Thames Path when new development comes forward. By requiring flood defences and flood risk minimisation strategies on these sites to incorporate measures which improve the amenity and biodiversity value of the Thames Path, the NSP will offset the negative amenity impacts of raising the river wall through policy P69: Reducing flood risk.

3.3 The Mayor of London is seeking to improve the natural environment across the city through the All London Green Grid green infrastructure framework and the new Environment Strategy. The NSP will ensure that development in Southwark contributes to this strategic aspiration by setting out clear requirements in policy P58: Green infrastructure.

3.4 London strategic views make a significant contribution to the image and character of London at the strategic level. This could be because of their composition, their contribution to the legibility of the city, or because they provide an opportunity to see key landmarks as part of a broader townscape, panorama or river prospect. These views are protected in the London Plan. Site allocations in the NSP clearly set out that the location of tall buildings should protect these views.

3.5 The NSP also proposes the protection of borough views. Lambeth's adopted local plan, similarly offers protection to borough views. We will work closely with the City of London, Tower Hamlets and Historic England to ensure that development that may impact upon the significance of our borough views or views designated in neighbouring boroughs is appropriate. The detailed geometry of the views towards St Paul's Cathedral proposed in the NSP and how they would interact with the protected views policies in the London Plan and the City of London's local plan has

been discussed with City of London. City of London officers were satisfied that there would be no material impact on development in the City arising from the proposed views. We will continue to work with Lambeth to ensure mutual protection of borough views.

- 3.6 Across London, local plans identify areas that have known archaeological interest or potential. The Greater London Archaeological Priority Area Review Programme is updating these areas. The NSP will update the policies map to replace the existing archaeological priority zones with new archaeological priority areas in line with the London-wide programme.
- 3.7 Some allocations in the NSP are located close to the boundary with Lambeth and could affect the setting of heritage assets in Lambeth, such as Brockwell Park, a Registered Landscape and Conservation Area. Guidance in the site allocations clarifies that the setting of these assets must be protected. We will continue to work with Lambeth to prevent any piecemeal development near Brockwell Park from harming the significance of the park or surrounding conservation areas.
- 3.8 The impacts of construction traffic, including to air quality, can cross borough boundaries. This is the case in the north of the borough where the Bankside and London Bridge Opportunity Area logistics group facilitates bi-monthly coordination with all contractors in the opportunity area as well as business improvement districts, Lambeth council and TfL. The NSP contains effective policies to improve air quality and manage the highways impacts of construction traffic. We will continue to work with Lambeth to ensure that the impacts of construction are mitigated.

Housing

- 3.9 Southwark is part of the wider London housing market area, which has complex sub markets. The London Plan sets out the borough level housing targets, but sub regions and Local Planning Authorities are advised to consider how and where housing is delivered and to what mix and tenure. In order to do this the Council has worked collaboratively with the GLA and neighbouring London boroughs on housing matters, in particular the other members of the South East London Housing Partnership.
- 3.10 The London Strategic Housing Market Assessment (SHMA) provides an assessment of housing need within the region and the London Strategic Housing Land Availability Assessment (SHLAA) identifies the housing requirement target set out in the London Plan. The council has inputted and been involved in both processes with the GLA.
- 3.11 The GLA prepared a London-wide SHMA (2013) as part of the London Plan, which concluded that London is a single housing market area and therefore Southwark falls within the London Housing Market Area. The London Plan further advises that there will be locally defined housing market areas across London that may go beyond authority boundaries. A new SHMA has been prepared to inform the draft new London Plan 2017 which maintains that London is a single housing market.
- 3.12 As part of addressing housing need across London, the GLA SHLAA identifies available land capacity for housing development across all of the London boroughs.

All London boroughs participate in this exercise in understanding past and potential future housing trends in their boroughs. The latest SHLAA has been prepared to inform the draft new London Plan 2017. Alongside the results of the SHLAA the council has identified additional sites in order to meet the housing targets for the borough and optimise delivery.

- 3.13 As a result of the London SHLAA and SHMA, the NSP includes the adopted London Plan targets and has identified sufficient land to meet these targets. The NSP identifies sufficient sites to build at least 2,736 new homes per year which would meet the adopted London Plan target of 27,362 new homes between 2015 and 2025. This is in excess of the 2,554 new homes per year required to meet the draft new London Plan target of 25,540 homes between 2019 and 2029. As a result of effective collaboration through the London Plan we have received no objections from other authorities in the city or wider region on our approach to meeting strategic housing needs.
- 3.14 The GLA advises sub regions or local planning authorities to work collaboratively where possible to identify local needs in terms of tenure and unit mix. The south-east London boroughs form an established housing market area within the wider London market. In 2008, Southwark jointly commissioned the South East London SHMA together with the other members of the South East London Housing Partnership (including Bromley, Bexley, Greenwich and Lewisham). The South East London SHMA was completed in 2014. The SHMA informs housing policies in the NSP, including targets for affordable housing. The group of boroughs will work together to update the sub regional SHMA in the future.
- 3.15 The London Plan designates opportunity areas for long-term delivery where the potential for new homes is especially high. We have worked with the GLA and neighbouring boroughs on the detailed planning of opportunity areas. Area visions and site allocations in the NSP will optimise their delivery.
- 3.16 Lambeth CCG have been working on an emerging market position statement for adult social care in Southwark and Lambeth. The NSP identifies several suitable sites for extra care housing as evidence of adult social care needs suggests some level of additional specialist accommodation will be needed in the future. We will engage with Southwark and Lambeth CCGs and Lambeth council in any efforts to better meet needs across the two boroughs.
- 3.17 Gypsies and traveller accommodation has been the subject of coordination with South East London boroughs. Planning policy for gypsies and travellers will be the subject of a separate DPD to the NSP, so is not covered further here.

Town centres

- 3.18 The adopted London Plan seeks a coordinated approach to the development of town centres. Boroughs are encouraged to designate new town centres to meet deficiencies in the network, particularly in opportunity areas identified for significant levels of mixed use development including town centre uses such as retail or leisure. For international, metropolitan and major town centres the new draft London Plan seeks to introduce a requirement for these centres to only be changes through the London Plan. This requirement is not yet adopted policy. Both the adopted and new London Plans encourage the transformation of out of centre retail locations to

reduce reliance on car travel. The NSP updates town centre and shopping frontage designations in line with this approach.

- 3.19 The GLA currently considers Canada Water to be a district town centre rather than a major town centre as they consider the activity at Canada water to be of district rather than major town centre level. Canada Water was designated as a major town centre in the 2007 Southwark Plan. This approach was found sound by a Planning Inspector. We have considered whether to change the designation of the centre in response to the GLA view. The town centre is expanding rather than contracting, allowing a transition from car dependent to modern shop formats. Delivery of the town centre is central to the redevelopment of the opportunity area under the adopted Canada Water Area Action Plan (AAP) 2015. Capacity forecasts for new retail floorspace indicates that developments at Canada Water, Elephant and Castle, Peckham and Old Kent Road could all be accommodated in the plan period. Therefore there are no reasons for the council to downgrade the town centre.
- 3.20 We have also given consideration to the GLA view that Old Kent Road should be two district centres rather than a single major town centre. Old Kent Road is one road with shops along the entire length. There is sufficient retail floorspace along the road at present for the town centre to be considered a major town centre. Our forecast capacity for new retail shows that in addition to other planned town centre development in Southwark, retail floorspace could increase from 64,500 sqm to 90,000 sqm along Old Kent Road. The draft Old Kent Road Area AAP/Opportunity Area Planning Framework (OAPF) sets out detailed masterplans for the transformation of retail in the area to less car-dependent modern town centre formats. Therefore there are no reasons for the council to consider shopping in the area to be part of two district centres rather than a single major town centre.
- 3.21 Town centres have been discussed at the South East London borough meetings and with other neighbouring authorities, including specific shared retail areas, such as Crystal Palace District Centre, and the role and potential changing role of other centres, for instance district, major and metropolitan centres and in response to specific development proposals and aspirations.

Employment

- 3.22 The London Plan requires boroughs and other strategic partners to promote and enhance the international, national and London-wide roles of the Central Activities Zone (CAZ) and its mix of local uses as well as strategic functions. The NSP contains effective policies to achieve this for the part of the CAZ located within Southwark. This includes site allocations that will achieve an uplift in employment space and further agglomeration of offices as well as supporting shopping, arts, culture, tourism, leisure, health activities and locally oriented uses. We will continue to work with Lambeth to manage the growth of visitor accommodation around Waterloo to ensure the most effective mix of land uses in that part of the CAZ.
- 3.23 The London Plan designates opportunity areas for long-term delivery where the potential for new jobs is especially high. We have worked with the GLA and neighbouring boroughs on the detailed planning of opportunity areas. Area visions and site allocations in the NSP will optimise their delivery.

- 3.24 The London Plan affords protection to strategic industrial locations as the city's main reservoirs of industrial land and related capacity, including strategic logistics. These are critical to the functioning of London's economy. The London Plan delegates the definition of detailed boundaries to local DPDs. The adopted London Plan requires their designation to be based on need and to enhance industrial activity. The draft new London Plan encourages boroughs to explore opportunities to intensify and make better use of industrial land. Strategic industrial land in Southwark is found in the Bermondsey / Old Kent Road / Surrey Canal Area. In preparing the NSP and OKR AAP/OAPF we have worked with the GLA and local stakeholders to build up a very detailed understanding of the need for employment space in the area. In order to make the most efficient use of land, an uplift in industrial activity and the number of jobs can be delivered through the creation of new mixed use neighbourhoods. At the same time the NSP reserves some strategic industrial land within revised designations for the intensification of purely industrial uses.
- 3.25 To that end the council and the GLA consider there to be a few specific industrial sites that should be protected as Strategic Protected Industrial Land, rather than changing to mixed use. We are proposing Admiral Hyson (SPIL3) as an additional site which the GLA had not considered. We are also setting out clear guidance on retention of the type of B use that is protected in Strategic Protected Industrial Land in the draft Old Kent Road AAP/OAPF. We are also setting out an approach to retain, improve and re-provide commercial workspace, including industrial workspaces outside Strategic Protected Industrial Land. These amendments should address the concerns. Therefore there are no reasons to extend the Strategic Protected Industrial Land to include the specific sites concerning the GLA.
- 3.26 We have been working closely with Lewisham, the GLA, TfL and others on the regeneration of the Old Kent Road area. We are working with Lewisham council and Network Rail on the development potential of a cross-boundary industrial site on the Bermondsey Trading Estate and land under and between the structures created in the Bermondsey "Dive-under" project, part of the Thameslink Programme. The site could offset and mitigate potential contraction of employment space elsewhere in the area. We will explore the feasibility of intensification and expansion of industrial land alongside operation of the railway and rail freight. We have been consulted by Lewisham on the nearby New Cross Gate masterplan and station interchange study as it has developed.
- 3.27 Employment is on the agenda of the South East London borough meetings. While the potential of joint studies has been discussed, it has been agreed to date that with the London studies, the detail is best augmented at a borough level, however, this will be kept under review. Discussions have included the opportunity area status of the Old Kent Road and any likely displacement and potential accommodation within other boroughs. We have advised that we are looking to re-provide business floorspace within the opportunity area.

Waste

- 3.28 London Plan Policy 5.17 sets out the requirement for boroughs to demonstrate that they have allocated enough land for the purpose of waste management – each is given an "apportionment" of waste, which represent quantities of household and

commercial and industrial waste for which each London Borough must take responsibility.

- 3.29 Both national policy and the London Plan recognise that it is not always practical, economically viable, nor environmentally sustainable for a planning authority to deal with all its waste entirely within its own boundaries and that is particularly the case within London. Therefore strategic planning policies for waste management allow waste management authorities to share their apportionment targets – as long as they can provide robust evidence as to how this is to be achieved.
- 3.30 In order to demonstrate effective collaboration, the SELJWG produces the South East London Waste Technical Paper. This report sets out general planning policy for waste, each borough's waste strategy and local planning policies and shows the sites which contribute to the waste management capacity requirement. It is reviewed by the group as individual boroughs prepare their Local Plan, allowing the capacity of sites to be kept up to date. Each borough must allocate its strategic waste sites formally in a DPD to safeguard them for the life of their Local Plan - in the event that a site is required for another use, the capacity must be re-provided, in accordance with London Plan policy. The NSP effectively safeguards the Integrated Waste Management Facility site in line with the paper.
- 3.31 As well as collaborating on the Technical Paper, the SELJWG takes part in wider strategic waste discussions through the London Waste Planning Forum, and discusses approaches from other local planning authorities to share apportionment further. Most recently, the group have been approached by the London Borough of Tower Hamlets and the group of the Western Riverside Authorities.

Health

- 3.32 The council have worked with the CCG to align the NSP, OKR AAP/OAPF and an estates strategy for local health facilities. Together they will ensure that the need for new healthcare floorspace and the transformation of services are achieved.
- 3.33 The NSP also contains effective policies to ensure that all development in the borough contributes to improved health and wellbeing. We have prepared joint evidence with Lambeth council to understand the impact of the built environment on residents' health in local regeneration areas. Research was commissioned to understand the effect of the built environment on social isolation, obesity and access to health services and to explore the opportunities to improve health through development. This has informed policy along with other joint working between planning and public health departments.

Transport

- 3.34 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 new Kerbside Strategy. The Mayor of London is updating the Transport Strategy, which sets out a strong vision to improve space and user experience of the public transport system. We have contributed our in-house transport planning expertise through the consultation so that the strategy can better unlock development, increase walking and cycling, increase road safety and perceptions of

safety, tackle poor air quality and fund infrastructure. Transport policies in the NSP have been prepared so that development can deliver the adopted and emerging aims for the transport network.

- 3.35 Cooperation with TfL, the GLA and other boroughs has fed in to the strategic transport projects in the NSP and is ongoing to progress their delivery. The Bakerloo Line extension to Old Kent Road and beyond is a key element of the growth strategy in the London Plan. The Mayor of London has committed to accelerating its delivery. The extension is being progressed through the growth partnership and the members are working together to expedite it. We are working with TfL and Lambeth on the case for the new rail station at Camberwell. We will continue to work with Lambeth to ensure that any impacts to the amenity of nearby residents in both boroughs are mitigated. Expanding the cycle route network will include the creation of strategic routes, planned and delivered with TfL. We are working with TfL on the detail of Cycle Superhighway 4 to ensure the impacts on the local road network are acceptable. TfL are consulting on the walking and cycling bridge from Rotherhithe to Canary Wharf. At Elephant and Castle peninsularisation of the former roundabout is complete and plans for the redeveloped shopping centre will facilitate improvement of the Northern Line ticket hall. The NSP's support for bus priority measures will help deliver TfL and the Mayor's objectives for improved bus services.
- 3.36 Other areas of ongoing cooperation include the Canada Water Strategic Transport Study, which is nearing completion and will further support growth in opportunity area. We will promote the implementation of our Kerbside Strategy through projects on TfL as well as local roads. We are working with TfL on road safety, notably on Peckham High Street. We are working to improve the implementation of disabled car parking and cycle parking standards in high density development.

4 Conclusion

- 4.1 We have made every effort to secure the necessary cooperation on strategic cross boundary matters and we have produced effective and deliverable policies in the NSP. Robust mechanisms have been put in place, including formalised partnerships and project teams to develop a shared evidence base with neighbouring authorities and prescribed bodies.
- 4.2 This statement has set out how cooperation has shaped the NSP in regards to the key planning matters that cross the borough boundary. We are engaging in ongoing constructive work with partners to ensure that the NSP, our neighbours', the Mayor's and other partners' plans are effectively implemented and reviewed in the future.
- 4.3 This statement demonstrates compliance with the NPPF in respect of the statutory duty for local planning authorities to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts. The council has fulfilled its duty to co-operate in producing the NSP consistent with Section 110 of the Localism Act 2011 (and explanatory notes), Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended) and Part 2 of the Town and Country planning (Local Planning) (England) Regulations 2012.

Appendix 1 Schedule of meetings

Organisation	Dates
South East London Boroughs Duty to Cooperate Group Lewisham, Bexley, Greenwich, Southwark and Bromley	2013 – 5 March, 7 August, 9 September, 7 November 2014 – 17 March, 27 March, 16 May, 7 July, 6 October, 23 October 2015 – 5 May, 6 July, 7 October 2016 – 20 January, 13 April, 13 July, 12 October 2017 - 1 February, 3 May, 13 September, 6 December
South East London Boroughs Duty to Cooperate Group plus Lambeth	2013 – 22 January, 7 February
South East London Joint Waste Group	2015 – 16 October
Old Kent Road Strategic Board Deputy Mayor of London, GLA, TfL, Lewisham	2014 – 18 September 2015 – 19 January, 31 March, 5 June, 17 December 2016 – 24 March, 23 November
Old Kent Road, New Cross and Lewisham Working Group Lewisham, GLA, TfL	2014 – 3 November, 14 July, 20 August, 23 September, 3 November 2015 – 12 January, 9 February, 16 March, 7 April, 9 June, 13 July, 7 September, 12 October, 9 November 2016 – 11 January, 8 February, 7 March, 11 July, 8 August, 12 September, 10 October 2017 – 6 February, 12 June, 24 July
City of London and Lambeth	2015 – 15 September 2017 – 15 September
Lewisham	2016 – 15 February, 21 July
Lambeth	2013 – 8 May, 22 May, 14 August, 11 September 2016 – 21 January
City of London	2017 – 17 October
Bromley	2013 – 22 January
Cross-River Partnership includes the central London boroughs along with business groups and other key stakeholders such as Network Rail, Groundwork London, London & Partners, Transport for London and the GLA. Its key focus is on economic growth, sustainable employment, carbon reduction and place-making.	Twice yearly board meetings
Association of London Borough Planning Officers	2013 – 30 April, 25 June, 10 September 2014 – 14 January, 4 March, 24 June, 9 September 2015 – 3 February, 31 March, 19 May, 29 September, 24 November 2016 – 21 January, 21 June, 27 July, 13 October 2017 – 14 March, 22 March, 16 May, 7 September, 7 December
Greater London Authority	2015 – 29 January 2017 – 16 May, 19 September, 6 December

Transport for London	
<p>London Councils London Councils represents London's 32 boroughs and the City of London. It is a cross-party organisation that works on behalf of all of its member authorities regardless of political persuasion. The strategic direction of London Councils is set by the Leaders' Committee. Our Leaders' Committee comprises the Leaders of all of London's local authorities. There is also a cross-party Executive, which guides the organisation's day-to-day work. The London Fire and Emergency Planning Authority and the Mayor's Office for Policing and Crime are also in membership.</p>	<p>2013 – 12 February, 12 March, 14 May, 11 June, 9 July, 8 October, 12 November, 10 December 2014 – 11 February, 11 March, 9 April, 15 July, 14 October, 9 December 2015 – 10 February, 24 March, 2 June, 14 July, 13 October, 8 December 2016 – 9 February, 22 March, 7 June, 12 July, 16 October, 6 December 2017 – 7 February, 21 March, 11 July, 10 October, 5 December</p>
London Borough Development Viability Group	Every three months
Southwark Health and Wellbeing Board	<p>2013 – 31 July, 22 October, 19 December 2014 – 24 March, 28 July, 2 October 2015 – 29 January, 16 March, 18 June, 21 October 2016 – 28 January, 31 March, 26 July, 4 October 2017 – 31 January, 2 May, 10 July, 11 September, 30 November</p>