

12 September 2017

Response to the New Southwark Plan, Preferred option – new and amended policies

1. This note has been prepared to inform Team London Bridge's response to the next stage of the New Southwark Plan. It follows earlier representations, including on the London Bridge Area Vision and site allocations.
2. Team London Bridge welcomes this further opportunity to help shape the emerging New Southwark Plan. This is a critical land use document and we are keen to collaborate with Southwark Council so that it complements the needs and aspirations of the business community in London Bridge. The London Bridge Plan sets out our strategic vision for the London Bridge area and this informs our response. The aims and projects of the London Bridge Plan have developed out of local public consultation with over 300 businesses and 400 individual comments, as well as taking into account existing and emerging local and strategic planning and economic strategies. The Plan was developed following a second BID extension to 2021 which was won in 2015.
3. We welcome the staged approach to developing the New Southwark Plan, bringing together the ambitions set out in Area Visions and key sites with the broader planning policy framework for managing future land use development and change. We have focused our comments on those issues of most relevance to the London Bridge Plan.

SP7 – Social Regeneration

4. We welcome the emphasis in SP7 on ensuring wide public benefits from new development. The London Bridge Plan identifies the important link between business development and the local community – *"Jobs are intimately tied to the quality of place. The attractiveness of a location for businesses, and the ability for business to connect with the community and create sustainable jobs, is critical for the long-term health of London Bridge"*. It is important that the approach embraces opportunities for people working as well as living in the area.
5. We believe SP7 would be strengthened by embracing the opportunities to provide for new employment and training, apprenticeships and other social benefits within major development taking place in the London Bridge and other areas. It should also embrace the opportunity provided by investment in culture. This approach would help to engage significant business and development interests in the delivery of the Plan's social regeneration objectives. It will be important for policy to emphasise the priority for meeting social regeneration objectives on-site or within the immediate vicinity of new development.

DM17 – Borough views

6. We commend the inclusion of a policy recognising the opportunities to enhance key views in the Borough. These play an important role in securing the identity and character of the area.
7. Team London Bridge is working with Shad Thames Area Management Partnership and Bermondsey Street Area Partnership to identify valued views and other “Placemarks” that shape the character of our areas. This includes an online mapping survey in which people are identifying the [Placemarks](#) that matter to them. This review has shown that people value not only views but also important buildings, open spaces, trees, public art, street furniture, rights of way, signs, names and many other things that contribute to local character. A majority of these are not recognised in planning or heritage policy or legislation.
8. We believe DM17 would be strengthened by taking a broader approach to understanding and celebrating and understanding the unique character of the different parts of the Borough by providing protection to a much broader suite of Placemarks than the Borough views which have been identified.
9. We should be happy to contribute proposals for inclusion in a revised DM17 and would also support the development of a Supplementary Planning Document on Placemarks which would amplify the approach.

DM22 – Student housing

10. We recognise the need to accommodate student housing while also having concerns to secure more benefits from a use which does not bring significant investment to the area. We believe DM22 could be strengthened to provide for more public and local community benefit where such development takes place. As drafted, DM22 only addresses the need to avoid an over concentration of student housing avoiding harm to local character or residential amenity and we believe there is also scope to address the potential to enhance as well as avoid harm. Student housing may, for example, provide more public access to the spaces and facilities it offers its main users, as well as active frontage. This would also support the social regeneration objectives of SP7.

DM24 – Office and business development

11. We strongly support the positive approach to accommodating a growing market for business uses. This is confirmed by our own analysis of demand in the London Bridge area. The London Bridge Plan seeks to ensure *“London Bridge will become the retail core for the borough of Southwark and the commercial core for London. A strong local economy will be bolstered by a mix of commercial users, tourism and local spend. Retail opportunities will expand, incorporating both traditional high street occupiers with local, independent fare that diversifies the district and provides an improved overall offer throughout London Bridge.”*
12. We believe DM24 could be bolder in establishing the ambition for commercial growth. It should also reference the contribution to be made to London’s Central Activities Zone.
13. Achieving this growth will require careful balance to be struck with other competing uses and within the London Bridge area we believe a priority should be established for commercial office, retail and leisure uses over residential. We believe DM24 would be strengthened by the New Southwark Plan making this approach clearer in its Area Vision for London Bridge.

DM26 – Small business units

14. We support recognition of the value of small business units in the New Southwark Plan. The Low Line is one important opportunity within the London Bridge area where existing small and independent businesses need protection and there are opportunities to attract new ones. Given the extent of the Low Line we believe it should be referenced in policy as a location where small and affordable business units will be important.

15. We believe DM26 can be strengthened to protect existing SMEs vulnerable to displacement. The policy test should be strengthened to establish an expectation that relocation will only be considered in exceptional cases unless there is agreement with the existing occupiers.

16. It will also be important for DM26 to acknowledge the value of mixed office and retail development.

DM27 – Town and Local Centres

17. The London Bridge Plan intends that “*London Bridge will become the retail core for the borough of Southwark*”. We do not believe this is consistent with identifying it as a “Local Centre” in DM27 nor do we believe this adequately reflects its existing status. The retail floor space associated with Borough High Street, London Bridge station, More London, Hay’s Galleria and Borough Market alone already makes London Bridge a “Major Town Centre” even before considering how it relates to the Bankside and The Borough area. The surface area is approximately 52,000 sq m (Retail 24,136 sq m and Hotel 27,945 sq m) with a further 7,000 sq m to be included in London Bridge station and excluding Guys and St Thomas’s campus.

18. We understand that the Central Activities Zone is in effect considered as a single town centre but question the efficacy of this approach, especially as it is not made clear in the Plan and the effect is to relegate London Bridge to being a “Local Centre”. Furthermore, we do not agree that Elephant and Castle/Walworth Road, Canada Water and Peckham are the centres with most capacity for growth. London Bridge is also an area which contributes significantly to the night time economy and one of the few locations where further growth can be supported without significant amenity issues.

19. We believe London Bridge warrants distinct recognition in a revised DM27 recognising it as being the equivalent of a Town Centre in DM27 and acknowledging its potential for growth.

20. We also look for a strengthening of DM27 to establish a priority for commercial office, retail and leisure uses over residential in Major Town Centres.

21. We believe DM27 should be more nuanced in its approach to development proposals, including by:

- Recognising the need for “diversity” in the retail and leisure offer not just protecting existing amenities and character from harm
- Supporting consideration of active frontages at more than ground level in Major Town Centres

Policy DM71 – Small Shops

23. We support the approach to securing a mix of provision in retail development, including a minimum of 10% of small retail units in larger developments. We believe DM71 can be strengthened by providing a definition of “affordable” as well as “small” and guidance on this is included in the Mayor’s 2014 Supplementary Planning Guidance on Town Centres. It should also identify the opportunity for a diversity of ownership of small units, including the role of community development trusts as one means of securing small units in the long term.

24. DM71 can also be strengthened to mitigate adverse impacts of the development by investing in measures to improve environmental quality which support existing small shops and the attractiveness/competitiveness of centres. This is consistent with the approach supported by the Mayor’s 2014 Supplementary Planning Guidance on Town Centres.

Other issues

25. We have made previous representations on the emerging Plan. We wish to emphasise two further opportunities:

Area Visions – we ask for an explicit reference to the London Bridge Plan prepared by Team London Bridge in the London Bridge Area Vision. This would appropriately reflect the high level of engagement in developing its contents and proposals

Policy DM25 – we ask that policies for the Low Line as a public realm opportunity and those for the Low Line as a location for business and community uses are brought together in an integrated approach which responds to the growing convergence of views around the Low Line as an integrating concept.

River Thames policies – as with our consultation response to the New Southwark Plan in February 2016, we ask that there be more comprehensive policies relating to the river Thames. In particular, we would like to see mention of improving the riverfront walk to support more use; more visitors; businesses; public art and performance – in particular by supporting the “Thames Esplanade” to cater for increased capacity. We would also like to see policies to support more use of the river for visitor based activity (as the HMS Belfast offers, but other opportunities include increased boat activity or a Lido), freight and public transport.

Cultural policies - as with our consultation response to the New Southwark Plan in February 2016, we ask that there be more comprehensive policies to encourage inward investment towards the Strategic Cultural Area (SCA) running along the Thames. In particular, we want to ensure a net gain through future development and for culture to support social regeneration aims in the SCA. We are currently completing a London Bridge Cultural Strategy to support this policy.

Next steps

26. We look forward to the final consultation draft of the New Southwark Plan, bringing together the policy framework and area visions. We should also welcome discussion over delivery and implementation of the Plan, including the potential for developing a range of supplementary planning documents.

Yours sincerely,



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Chairman
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