

Item No. 16.	Classification: Open	Date: 28 January 2014	Meeting Name: Cabinet
Report title:		Blackfriars Road Supplementary Planning Document	
Ward(s) or groups affected:		Cathedrals	
Cabinet Member:		Councillor Fiona Colley, Regeneration and Corporate Strategy	

FOREWORD - COUNCILLOR FIONA COLLEY, CABINET MEMBER FOR REGENERATION AND CORPORATE STRATEGY

Blackfriars Road is a wide boulevard running south from the River Thames to historic St George’s Circus, linking Elephant and Castle to the South Bank and beyond to the City. The area is being transformed by a series of new developments alongside the opening of an entrance to Blackfriars Station and innovative public realm schemes.

I am recommending that this SPD is adopted to ensure that the pressure for residential development is balanced with the need for places for leisure and business and a pleasant environment. Development needs to take place in a coordinated way so that Blackfriars Road reaches its potential and meets the needs of both existing and new residents. This SPD will provide a strategic framework and detailed guidance to coordinate future growth along and around the Blackfriars Road.

Our emerging vision is that Blackfriars Road will be transformed into a vibrant place, a destination rather than a thoroughfare. Running south from the river front at Bankside to historic St George’s Circus, Blackfriars Road is a gateway north into Central London, and south to the Elephant and Castle. The historic, wide boulevard will provide a range of different activities regenerating the area from the river along Blackfriars Road and stimulating change at the Elephant and Castle. Much of the character and historic value of the surrounding residential areas, particularly the conservation areas and listed buildings will continue to be protected and enhanced.

One particular highlight is the work we are doing with TfL, to create an elegant public realm incorporating a safe, segregated route for cyclists.

We will continue to work with the local community, residents, landowners and many of our partners and stakeholders to enhance the Blackfriars Road and surrounding areas. By working with all these groups and stakeholders we will manage the fast paced change taking part on the Blackfriars Road whilst ensuring development meets the needs of both existing and new residents

RECOMMENDATIONS

That cabinet:

1. Adopts the Blackfriars Road Supplementary Planning Document (SPD) (Appendix A).

2. Notes the representations received on the draft Blackfriars Road SPD and the officer comments to the representations (Appendix B). Notes the tracked change version of the Blackfriars Road SPD which takes into account the representations received on the draft Blackfriars Road SPD (Appendix C).
3. Notes the consultation report (Appendix D), the updated equalities analysis (Appendix E), the updated sustainability appraisal (Appendix F), the sustainability appraisal statement (Appendix G), the appropriate assessment (Appendix H) the updated urban design study (Appendix I) and the updated business and retail background paper (Appendix J).

BACKGROUND INFORMATION

4. The Blackfriars Road SPD covers an area of approximately 56 hectares, taking in all of Blackfriars Road, running from Blackfriars Bridge to St George's Circus, and some of the surrounding streets. The area is part of the Cathedrals ward.
5. The SPD lies mostly within the Bankside, Borough and London Bridge Opportunity Area, which is identified in the London Plan as having the potential to provide around 25,000 jobs and a minimum of 1,900 new homes. A small part of the southern end of Blackfriars Road around St George's Circus lies within the Elephant and Castle Opportunity Area. There is already an adopted supplementary planning document/opportunity area planning framework for Elephant and Castle which the Blackfriars Road SPD is consistent with. It is appropriate to include part of the Elephant and Castle Opportunity Area within the SPD for Blackfriars Road to ensure a cohesive strategy for the area. The Blackfriars Road SPD will replace the guidance for the Elephant and Castle SPD for the overlapping area.
6. The council previously prepared a draft SPD/opportunity area planning framework for Bankside, Borough and London Bridge in conjunction with the Greater London Authority, which was consulted upon in 2010. This Blackfriars Road SPD updates the guidance for the Blackfriars Road. A review is being carried out regarding the policy and guidance necessary for the remainder of the Opportunity Area as part of the preparation of the New Southwark Plan.
7. Blackfriars Road is rapidly changing with many large sites under construction, about to start construction or going through the planning process. There is also potential for further change with a number of development sites likely to come forward within the next five years. The SPD provides a strategic framework and detailed guidance to provide a focus and an understanding of the amount of development that will create a vibrant, pleasant street along Blackfriars Road. The purpose of the SPD is to find a balance between the pressure for dense residential development and the need to provide a place where business can thrive and residents and workers can enjoy arts, cultural and leisure activities. The draft SPD puts forward the idea of finding the unique characteristic of Blackfriars Road. From the consultation this has emerged as the character of the street as a large wide boulevard in Central London helping to regenerate along the River front, along and around Blackfriars Road and south to Elephant and Castle.
8. The SPD is consistent with and provides further detailed guidance to the policies in the development plan: the London Plan (2011, Core Strategy (2011) and the saved Southwark Plan (2007). It is also consistent with the National Planning Policy Framework (2012).

9. The draft Blackfriars Road SPD was approved for consultation via the Individual Decision Maker process in June 2013. The draft SPD was made available for public consultation between 21 June and 12 September 2013. Following the close of consultation, the representations received on the draft SPD have been considered and where appropriate changes have been made to the document. A tracked changes version of the SPD is provided in Appendix C.

CONSULTATION

10. The Planning and Compulsory Purchase Act 2004 (as amended), the Town and Country Planning (Local Planning) Regulations 2012 and Southwark's Statement of Community Involvement 2008 (SCI) set out consultation requirements for SPDs. We met these requirements in consulting on the SPD as set out in more detail within the consultation report (Appendix D).

Previous stages of consultation

11. We have taken into consideration previous related consultations in preparing the Blackfriars Road SPD. The area covered by the Blackfriars Road SPD lies mostly within part of the Bankside, Borough and London Bridge Opportunity Area. A small part of the SPD area falls within the Elephant and Castle Opportunity Area. The council consulted on a draft Bankside, Borough and London Bridge SPD in 2010, which set out draft guidance for the whole of the Bankside, Borough and London Bridge Opportunity area. The council also consulted on an Elephant and Castle Opportunity Area SPD/Opportunity Area Planning Framework, which was adopted in 2012. We reviewed feedback received on both these documents in preparing the SPD for Blackfriars Road.
12. We also consulted on a sustainability appraisal scoping report in October 2012 for the whole of the Bankside, Borough and London Bridge Opportunity Area. Comments received on the scoping report fed into the preparation of this SPD and the sustainability appraisal. Officer comments on all the comments received on the sustainability scoping report are set out with the updated sustainability appraisal (Appendix F).
13. Consultation has also been carried out informally throughout early 2013, including developing many links with local residents, groups and business. This has included walking tours and consultation at pop up cafes. More detail on this wider consultation can be viewed at:
www.southwark.gov.uk/blackfriarsroad

Summary of the consultation carried out on the Blackfriars Road SPD

14. We consulted with a wide range of organisations, local groups and residents on the draft Blackfriars Road SPD. In accordance with our SCI, the SPD was available for comment for a period of 12 weeks, from 21 June to 12 September 2013.
15. We publically launched the draft SPD at a New London Architecture event on 21 June 2013, where the Leader of the council introduced the SPD, and copies of an SPD summary leaflet were made available. The SPD was made public on our website from this date.

16. In accordance with the Regulations and our SCI, we wrote to all our neighbouring boroughs and prescribed bodies to let them know that the SPD was out for consultation, with details of how to comment and where to view the SPD. We also wrote to everyone on the planning policy mailing list (around 3000 groups and residents). In addition we distributed a four page SPD summary leaflet to all the addresses within the SPD boundary.
17. Officers ran two workshops on the SPD in August to enable residents and groups to discuss the SPD in detail. Officers also attended a further four meetings/events organised by local groups and residents. The SPD was also made available at Borough, Bankside and Walworth Community Council, and was taken to Planning Committee for comment.
18. Councillor Colley and the Director of Planning met local ward Members and residents to discuss their concerns with the SPD.

Summary of representations

19. 636 representations were received from 75 groups and individuals. All of the representations and the officer responses to these are set out within Appendix B. A summary of the representations is set out below.

Planning Committee

20. The draft SPD was taken to Planning Committee for comment on 3 September 2013. Planning Committee noted the SPD was out for consultation and provided no formal comments on the draft SPD.

Members

Ward members for Cathedrals ward

21. Ward councillors raised concerns about:

- The SPD being rushed through when they considered there to be two neighbourhood plans in the pipeline covering parts of the SPD area.
- The boundary of the SPD particularly the inclusion of the area to the south of St George's Circus.
- The emerging vision, including that they find it unclear from the draft SPD what the "distinct identity" will or should be. They question how it will be delivered when it is so vague. They feel that there are two separate characters within the SPD boundary. They ask how cultural, leisure, arts and entertainment uses will be encouraged. They also raise concern that the SPD emerging vision and SPD 1 should be clearer in supporting policy 1.5 of the Southwark Plan.
- The development sites, setting out some they think are incorrectly referenced, one they think should not be included and one that needs clearer guidelines.
- The number of hotels in SE1 should be restricted to ensure other important planning needs can be met.
- The acknowledgement that the impact of food, drink, evening and night time economy uses on local amenity must be considered but also request that reference should be made to the saturation area in place.

- A tall building at Southwark tube or St Georges' Circus. They comment on this within the emerging vision and SPD 5. They emphasise their strong opposition to tall buildings on the southern end of Blackfriars Road.
- Residents living in the area should have a higher profile in the list of groups involved and that ward councillors should be included in the list.

Councillor Barber

22. Councillor Barber was surprised to see some cycling provision had dropped out. He set out that it had been agreed to target re-establishing the Hopton Road through to Upper Ground under Blackfriars Road bridge link. He asks for this east-west corridor for cyclists to be re-established. He sets out that ideally this indicative cycle link would be clearly marked on figure 6.

Local residents, individuals and groups

23. 41 residents/individuals and 12 local groups provided representations on the draft SPD. Representations were received from a range of groups representing both residents and local businesses. The following groups submitted representations:

- The St Georges Circus Group
- Southwark Living Streets
- Bankside Residents Forum
- South Bank Employers Group
- The Albert Association
- Better Bankside
- Waterloo Quarter Business Improvement District
- Waterloo Community Development Group
- Bankside Open Spaces Trust
- Webber and Quentin Tenants and Residents Association (two sets of representations)
- St George's R.C. Cathedral

General comments

24. A number of residents and groups suggest that the SPD does not take into account the views of the residents already living in the area and the focus of the SPD is about development rather than the needs of residents.
25. A small number of residents commented that they find the document to be written in non-accessible language, not in plain English.
26. Some groups, including South Bank Employers Group and Waterloo Quarter Business Improvement District feel that the SPD should look more at cross boundary issues.
27. Bankside Open Spaces Trust welcomes the SPD, particularly the general commitment towards open space, greening and enhancing the public realm. However they also have one key concern with the boundary of the SPD and that they think it should not overlap with the Elephant and Castle SPD boundary and so they think the SPD should be withdrawn. They contend that the council should withdraw the SPD and reissue a SPD with an appropriate boundary to interlink with the Elephant and Castle SPD.

Links with neighbourhood plans and other planning documents

28. Some groups and residents ask the council to demonstrate that the SPD will give a better outcome than those envisaged by neighbourhood forums. Some groups including Waterloo Development Group also raise concern that they think the SPD is premature before the forums begin their neighbourhood plans.
29. Better Bankside raise concern that they cannot formulate a response without the benefit of the neighbourhood plan consultation. They welcome the council's views on how the adoption of the SPD and the neighbourhood plan can dovetail.
30. South Bank Employers Group suggest it would be helpful to include more detail in the SPD on how the different documents such as the New Southwark Plan, neighbourhood plans etc all fit in with the SPD. They also ask that the SPD should reference its commitment to working in partnership with South Bank and Waterloo Neighbourhood Forum throughout.

Status of the SPD

31. Some residents feel that the Southwark Plan and Core Strategy should be updated before the SPD is adopted.
32. Some groups and residents ask why the SPD is not given a different status due to the quantum of change planned. Some groups ask why it is not a masterplan. Some say that they are unclear of the status of the SPD.
33. Some groups and residents contend that the council falls short of its obligation under the Town and Country Planning Act, the National Planning Policy Framework, regional policy and its own adopted policies by attempting to use the SPD to introduce new guidance as if it is policy, specifically for tall buildings. They feel that the SPD is not consistent with national, regional and local adopted policies.
34. The Albert Association set out that if the SPD is taken forward and approved by cabinet they will consider the option of a Judicial Review.

Boundaries of the SPD

35. Some residents and groups questioned the SPD boundary. A number of different issues were raised.
36. There were some concerns around the south of the SPD boundary overlapping with the Elephant and Castle SPD.
37. Waterloo Community Development Group suggest that the SPD should focus on either Bankside or Waterloo, not the area proposed in the SPD. They contend that there is no need for an SPD for the proposed area.
38. Quentin and Webber Tenants and Residents Association ask that the boundary be redrawn or a second SPD be produced to take into account that the Blackfriars Road is completely different and separate to the surrounding streets as they view them as two completely separate areas. They also suggest that the southern part of the boundary is too wide and it should focus more on Blackfriars Road itself.

39. Bankside Open Spaces Trust contends that the council should withdraw the SPD and reissue it with an appropriate boundary to interlink with the Elephant and Castle SPD. They set out that they think it is contrary to national planning policy to have overlapping areas of SPDs.

Vision

40. Some residents and groups feel the SPD lacks a clear and inspiring vision.
41. Some groups and residents feel that the vision focuses predominately on larger commercial development and that the needs of small businesses and residents have not been sufficiently considered.
42. Some residents dislike the focus of the vision on making the area a destination where people want to “live, work and visit” as it ignores the fact that people already do.
43. Some residents and local groups feel that the vision does not acknowledge the differing characters of the area.
44. Bankside Open Spaces Trust make a number of suggested changes to the vision including wanting reference about working towards creating a coherent landscaping scheme, looking at opportunities to create new open spaces within development sites.

Development sites

45. Some residents and local groups ask for more detail on the potential development sites, wanting plans of what is likely to happen and information on why these sites have been selected.
46. A number of residents and community groups object to the inclusion of development site 43: Bakerloo sidings within the SPD.
47. Quentin and Webber Tenants and Residents Association suggest Friars Bridge Court, 41-45 Blackfriars Road should be included as a development site.
48. Waterloo Community Development Group comments that many of the sites proposed for redevelopment are not development opportunities.

SPD 1: Business space

49. Some residents and community groups including Waterloo Community Development Group feel that the small businesses in the railway arches should not be replaced with offices. Similarly some groups including Webber and Quentin Tenants and Residents Association think there is disregard for the principle of encouraging and helping small businesses.
50. Waterloo Quarter Business Improvement District welcomes the reference to flexible innovative business space. However they raise concern with the emerging trend towards loss of office space in the southern section of Blackfriars Road and emphasise that the increase in diversity of business space should not be at the expense of reducing the overall quantity. They also welcome the

proposal to continue to convert railway arches into a variety of commercial uses and also welcome the promotion of active frontages along Blackfriars Road.

51. Bankside Residents Forum suggests that development should be required to provide affordable business space.

SPD 2: Mixed use town centre

52. Some residents and local groups commented on needing a range of shops, with a number of residents and groups specifically mentioning wanting a supermarket. Others commented that there are too many small supermarkets and chain restaurants and that there should be more local independent small businesses.
53. A number of groups and residents express concern that they feel that the needs and impacts of residents are not considered enough in the SPD.
54. Some groups and residents including Bankside Residents Forum and Quinton and Webber Tenants and Residents Association question why hotels are being promoted when Southwark already are close to their target. There is also questioning of whether hotel facilities are used by local residents.
55. Some residents suggest that there should be no further A5 use (hot food takeaways). Some residents also suggested that new business spaces should be limited in size to attract local and SME retailers, dedicated space for art galleries, and avoid space only being used Monday to Friday.

SPD 3: Public realm and open space

56. Some residents and groups commented on the lack of green and open spaces in the SPD area and that the council should seek to increase this provision from new development.
57. Some groups think the guidance should go further in encouraging improved public realm. There are comments about improving the areas around the railway viaducts.
58. Southwark Living Streets welcome the number of improved and proposed pedestrian links north of Southwark Station. They also provide detailed comments on possible improvements including wanting to see Christchurch and Paris Gardens enhanced, extending the green route from the river south to The Cut and Southwark Station. They also propose that development number 27 should have a through pedestrian route to address the few pedestrian routes south of Southwark Station.
59. Southwark Living Streets set out that they feel that the Circus is currently a barrier for pedestrian movement. They think the SPD should be clear about requirements at this intersection. This should require the central island needing to be linked to its surroundings by pedestrian crossings of the road.
60. Some residents and groups ask how the Allies and Morrison Blackfriars Road Public Realm Study has been taken into account in the SPD.
61. Bankside Open Spaces Trust suggest that SPD 3 should focus more on green spaces and links. They also include a list of further smaller local open spaces that they suggest should be added to the diagram. Some residents also

comment on the need to protect and encourage more pocket parks and smaller green spaces and links.

SPD 4: Built form and heritage

62. Some groups and residents comment that there is not enough emphasis on conserving and enhance the existing heritage, specifically in relation to the building heights guidance. Concern is expressed about losing the heritage of Blackfriars Road and its surrounding area, with specific mentions of recent planning applications and approvals.
63. A number of local community groups and residents including The St George's Circus Group comment that the Elephant and Castle SPD has a list of buildings that are or have the potential to be locally listed and that it is notable that this SPD does not. There are requests, including those from Bankside Residents Forum to include a list of heritage buildings/local listed buildings/buildings of particular interest. Some residents and groups have also suggested other buildings to be added to the council's list.

SPD 5: Building heights

64. Many residents and local groups object to the SPD's approach to building heights. The majority of residents and local groups object to the proposed building strategy for the area from Southwark Tube Station to St George's Circus. The main focus of the comments were opposing a possible tall building at St George's Circus. There were also comments on the criteria for tall buildings.
65. Some community groups including the Albert Association, The St George's Circus Group, Webber and Quentin Tenants and Residents Association and a number of residents, content that the SPD is setting new policy for building heights and that it is contrary to the Core Strategy and/or the Bankside, Borough and London Bridge Tall Building Study (2009) and/or the Tall Buildings Study 2010. They claim that the SPD is contrary to the Core Strategy in relation to tall buildings at the southern end of Blackfriars Road.
66. Residents and community groups raise concern particularly of a building of up to 70 metres at St Georges Circus with many objections that the council is ignoring the importance of St George's Circus obelisk and the surrounding conservation area. Some of the residents and groups state that the area is not a public transport node. Many residents and groups also object to the up to 30 metres along the section of the Blackfriars Road from Southwark Station to St George's Circus.
67. The contention is made by some of these groups that the council has not identified within the local development framework in advance of specific proposals, the spatial, scale and quality requirements. They feel that the council is attempting to circumnavigate the process in an attempt to rush through the SPD to justify Barratt Homes speculative application for a 70m tall building at St George's Circus. Some groups and residents state that there is no evidence to demonstrate that a tall building at St George's Circus would not dominate.
68. The St George's Circus Group content that the new guidance fails to recognise the distinctive character of southern Blackfriars Road as a mainly low-rise area with many historic listed and non-listed buildings. They also suggest that the

guidance is unclear re whether the guidance for building heights applies within the St George's Circus Conservation Area.

69. Some residents and groups object to the proposed building heights at Southwark Tube Station, citing that the Palestra building is too tall and dominant already. Many feel that the proposed height is too high and out of context.
70. One resident supports the height proposals at the north end of the road.
71. There are also many concerns on building heights impacting on local views, wind tunneling and daylight and sunlight. A number of residents raise that they consider there to be no mention of environmental impact assessment, wind and daylight modeling.
72. Some residents and groups have raised concern that the council told UNESCO that they would take care with tall buildings and they feel that is not happening.
73. Southwark Living Streets are concerned that a larger number of tall buildings could form a canyon effect creating swirling winds that will cause pedestrians difficulties.

SPD 6: Active travel

74. A number of residents ask for more detail on cycling within SPD, particularly on including segregated cycle lanes and further upgrades for cycle infrastructure.
75. Southwark Living Streets think a strong case should be made for a 20mph speed limit in the whole area, and especially on Blackfriars Road itself.
76. Bankside Residents Forum comment that the SPD should also refer to fact that many cyclists and pedestrians prefer to use the smaller scale, quieter routes away from major roads and that this should be reflected in the plan's vision and proposals.
77. A number of residents and community groups have commented that Blackfriars Road falls under the jurisdiction of TfL. They comment that under the Localism Act both TfL and the council are duty bound to share any consultation information regarding active travel. They ask about plans proposed by TfL.
78. Waterloo Community Development Group feel that traffic speed, noise, pollution and traffic volumes are not addressed in the SPD. They suggest that the road should be narrower at points and the pavements wider.

Implementation and infrastructure

79. A number of residents and groups raise that the SPD does not plan for the necessary infrastructure including social amenities such as community space, health facilities, children's play facilities and other open areas.
80. Some groups and residents think there should be more detail on section 106 and the Community Infrastructure Levy as well as more detail on infrastructure costs and delivery. South Bank Employer's Group content that ideally the SPD should await further input from the two neighbourhood forums.

81. There were some comments from residents setting out existing problems such as the amount of construction taking place, some comments on streets being used for loading/parking areas for construction etc.

Housing and residents

82. A number of residents and groups comment that they feel that the SPD is favouring developers and there is not enough emphasis on the local community and its needs.
83. There were some comments raising concern on the amount of private housing being delivered in the area and the need for more affordable housing in the area. Some groups and residents request further information and guidance on affordable housing policy and delivery. Some groups such as Bankside Residents Forum comment that the council's affordable housing policy already has no credibility and should be actively written into the SPD.
84. South Bank Employer's Group suggests that the SPD should consider how it can support local universities in their student housing needs.

Environment and sustainability

85. South Bank Employer's Group comments that the SPD is silent on carbon reduction. They refer to the need for further guidance on green infrastructure within the SPD.
86. One local resident commented that they would like to see an overarching environmental policy and there were a number of comments on the need for SPD 5: Building heights to focus more on the impacts of the environment.
87. There were a few comments about the need to restore and renew the existing building stock rather than complete redevelopment.

Equalities analysis

88. One resident commented on the equalities analysis, stating that it is entirely devoid of evidence for any of its assertions. It does not appear to have resulted from any factual base nor from consultation with the affected groups.

Urban design study

89. Bankside Residents Forum comments that they feel that the fact that the evidence base has been prepared in house gives the outcomes less credibility.

Consultation

90. A number of residents and community groups have raised concern that they feel that the SPD has been rushed through.
91. A small number of residents and local groups expressed disappointed that the SPD was launched at the NLA, outside of the borough.
92. Similarly a small number expressed disappointment that that consultation took place over the summer holiday period.

93. Some residents raised concern that they felt that there was inadequate consultation time.

Developers/landowners

94. The following landowners/developers provided representations on the SPD.

- London South bank University
- Empyrean Developments
- CEREP Sampson House, CEREP Ludgate House and Carlyle Real Estate Advisors LLP
- Linden Homes
- Lenta Business Centre
- Guidewell Ltd
- Network Rail
- CBRE Lionbrook & Southwark Charities
- Blackfriars Limited
- Development Securities
- Barratt London
- Dunedin Property Asset Management
- 34 - 68 Colombo Street

General comments

95. A large number of developers and/or landowners support the production of the SPD.

Boundaries of the SPD

96. London South Bank University suggest that the boundary of the SPD be extended further south to take in more of the Elephant and Castle opportunity area to include two sites within London South Bank University's ownership.

Vision

97. A number of developers and landowners overall support the emerging vision. In particular there is support for the overall vision for tall buildings.
98. Some developers suggest that the vision should also mention new residential development and the continued provision of housing.
99. London South Bank University ask for higher education to be acknowledged in the vision.
100. Network Rail support the aspirations in the vision but ask that it refers to employment opportunities rather than small businesses where it refers to the railway arches in line with their objectives.

Development sites

101. Some of the developers/landowners request further sites to add to figure 5: Potential development sites. This includes the following:

- Lenta Business Centre suggests the Foundry Annex, located on Webber Street and Glasshill Street.
- Network Rail suggests three new sites to identify as development site: Bear Lane Site, Dolben/Gambia Street Site, and Great Suffolk Street/Union Street/Ewer Street site.
- Guidewell Ltd suggest further land within their ownership: Rennie Court, the Doggetts Coat & Badge Public House and River Court
- 34-68 Colombo Street – suggest their site Colombo Centre, 34-68 Colombo Street
- London South Bank University suggest:
 - -Caxton House on Borough Road
 - -The Passmore Edwards Library/12 Borough Road on Borough Road
 - -Peabody Hugh Astor Court housing on Thomas Doyle Street

102. CBRE Lionbrook and Southwark Charities request that the boundary of site 9: Quadrant House and Conoco House be extended.

103. Dunedin Property Asset Management questions the inclusion of a number sites and their impact on St George's Circus.

SPD 1: Business space

104. There is some support for the guidance.

105. Development Securities, Barratt London, CEREP Sampson House, CEREP Ludgate House and Carlyle Real Estate Advisors LLP put forward that greater emphasis needs to be placed on residential development and that not all of Blackfriars Road is suitable for Grade A office accommodation or larger floorspace offices.

106. Lenta Business Centre find that SPD 1 is too restrictive and suggest amendments to the guidance to incorporate more flexibility such as a credit scheme between developments and allowing relocations of existing business space onto another existing business site within the borough.

107. Network Rail request that paragraph 3.6 refers to employment opportunities rather than small business when it refers to the opportunities in the railway arches to be consistent with their objectives and the NPPF.

SPD 2: Mixed use town centre

108. Some of the developers/landowners support the guidance.

109. A number of developers/landowners contend that housing should be included within SPD2 or somewhere else within the SPD.

110. A number of developers including CEREP Sampson House, CEREP Ludgate House and Carlyle Real Estate Advisors LLP, Barratt London, Development Securities contend that the fact box on town centres uses is not consistent with the NPPF.

111. Blackfriars Limited agrees that demand for hotel rooms in Southwark will continue to grow. Dunedin Property Asset Management asks why hotels are

being promoted when Southwark is already close to achieving the GLA requirements.

SPD 3: Public realm and open space

- 112. Some developers/landowners support the guidance.
- 113. A few developers commented that it will not always be possible to provide substantial areas of public realm.
- 114. London South Bank University asks that London Road is also shown on figure 6 as a possible green route and key approach.

SPD 4: Built form and heritage

- 115. Some developers/landowners support the guidance and its approach to promoting high quality design.
- 116. Network Rail ask for flexibility with how the council requires the use of materials that are considered sympathetic to the heritage of the area as there may be circumstances where alternative methods may be required to allow the function of the railways. They specifically object to the stringent use of “resisting the use of solid external roller shutters”.

SPD 5: Building heights

- 117. Overall the majority of the developers/landowners support the overarching vision for more tall buildings but have detailed comments on the potential heights of the tall buildings and the criteria required for tall buildings.
- 118. Network Rail thinks that the tall building guidance should be reviewed and that the stringent control over the location of tall buildings should be relaxed. They suggest an alternative southern boundary for the tallest buildings as the railway viaduct between Waterloo East and London Bridge. They set out that this would not impact upon the protected strategic views.
- 119. Network Rail also think that the thresholds in the guidance for Southwark tube and at St George’s Circus are too restrictive and should say “in the region of 70 metres” rather than up to 70 metres.
- 120. Linden Homes question what they consider to be arbitrary building height limits in the SPD. They contend that buildings that exceed 30 metres could be located in locations along Blackfriars Road.
- 121. Guidewell Ltd support SPD 5 in not setting a specific upper limit to building heights on the north of Blackfriars Road and suggest that it would be helpful if the SPD makes it clearer by stating that there is no defined upper height limit at this northern end.
- 122. Dunedin Property Asset Management objects to a tall building at St George’s Circus.
- 123. London South Bank University is generally supportive of the building heights strategy in the SPD, especially the identification of St George’s Circus as a

suitable location for a tall building. They ask for further clarification on whether it is envisaged for single tall building or a cluster of tall buildings.

124. Barratt London welcomes the acceptance of a tall building at St Georges Circus. However they feel it is inappropriate to prescribe a height of up to 70 metres. Instead it would be appropriate to note the potential for a tall building at 128-150 Blackfriars Road/ St George's Circus which represents a step down in height from the very tall buildings at the north of Blackfriars Road and at Elephant and Castle which are up to mid 40 storeys.
125. Development Securities welcomes the acceptance that Southwark Tube is an appropriate site for a tall building. However, they question the appropriateness of including the 70metre height as they do not feel it is appropriate to apply what they consider to be a cap on the height.
126. Development Securities, Barratt London and CEREP Sampson House, CEREP Ludgate House and Carlyle Real Estate Advisors LLP support the objective of exemplary standard of design and high quality accommodation for taller buildings. Barratt London requests that reference should be included to exceeding the minimum dwelling size standards within the London Plan.
127. A number of developers including Development Securities, Empyrean Developments, Blackfriars Limited and Barratt London consider that some of the criteria for tall buildings are too prescriptive. Specifically there are objections to the requirement for publically accessible area on upper floors, and the link requiring the amount of public space at the base of the building to relate to its height.

SPD 6: Active travel

128. Network Rail support SPD 6.
129. London South Bank University recommends that the TfL modeling of Blackfriars Road should be extended to include the whole of London Road.

Greater London Authority

130. The Mayor sets out that the SPD appears comprehensive and should prove to be a useful tool for both planners and prospective developers.
131. The Mayor in particular supports the council's approach to tall buildings and its building height strategy in the Blackfriars area. In Vauxhall Nine Elms Battersea OAPF some heights were limited to avoid them appearing in the Mayor's strategic views. As this is not the case on Blackfriars Road, the Mayor would welcome a more flexible approach, suggesting the wording should say "in the region of 70/30metres" rather than "up to 70/30 metres". He also comments that as stated in the SPD, it will be important to demonstrate that the buildings contribute positively to London's skyline.

Transport for London (Borough Planning)

132. Transport for London (TfL) (Borough Planning) responded that they are the Highway Authority for Blackfriars Road and that as they are in early stages of designing urban realm improvements they are not in a position to support specific proposals (they specifically mention lighting and public art).

133. They request that the vision is revised to reflect the emerging proposals in the Mayor's Vision for Cycling in London. They also request that the wording "ensuring vehicular traffic continues to move smoothly is removed" as TfL will be undertaking detailed and London wide traffic modeling to test design options and at present are unable to determine the likely impact of proposals upon vehicular traffic.
134. TfL (Borough Planning) encourages the council to continue to work further with Network Rail and where appropriate with South Eastern to discuss future options including those for Waterloo East.

Transport for London (Property)

135. Transport for London (TfL) Property support site 18, Southwark Tube Station, and site 43, TfL Bakerloo sidings.
136. TfL Property support the principle of development on site 18 but also comment that whilst a tall building is welcomed at this location it can only be achieved if the structural capacity of the existing station structure remains unaffected and disruption to the tube network is not incurred. They ask for additional wording to be inserted into the supporting text of SPD5: Building heights to make it reflect the operational and engineering constraints on this site.
137. TfL Property raise that on site 43, Bakerloo Sidings, they require the support of planning policy for a tall building on site 43, to ensure viability of developing this site.

English Heritage

138. English Heritage in general supports the aims of the SPD to provide a framework to guide future development in a coordinated manner. However they think that a masterplan should be prepared for the Blackfriars Road area due to the scale of proposed change.
139. English Heritage raise a concern that they think including an emerging vision is beyond the scope of a SPD as they think it is setting policy. They also raise concerns that they think the SPD sets new policy for building heights further than the policy set out in the Core Strategy.
140. English Heritage support the encouragement of railway arches to be used for a range of business including creative and cultural industries but also feel that we should promote this concept to other buildings as well as the railway arches.
141. English Heritage welcome SPD 4's emphasis on the conservation and enhancement of the historic environment, but are concerned that the many opportunities sites identified could result in the loss of buildings of particular local interest. They are concerned that the scale of development proposed and the potential loss of buildings of local interest could mean the resultant character does not reflect the current positive aspects of the area.
142. They ask the council to look at undesignated heritage assets within the SPD.
143. They are concerned that the significance of the historic environment may be potentially harmed by the change in heights proposed in the SPD. They think that

greater justification needs to be given for the north of Blackfriars Road where they are no defined height limit. They are concerned about the impact of these tall buildings on heritage assets including north of the river.

144. English Heritage also asks what is being proposed at Southwark tube station and St George's Circus. They do not see the justification for a taller landmark element at St George's Circus especially due to the grade 2 * listed obelisk already in their view providing a legible historic landmark.
145. English Heritage also provides some minor comments on the sustainability appraisal.

Environment Agency

146. The Environment Agency welcomes the SPD and supports the emerging ideas for a vision on Blackfriars Road. They set out that they would wish to see developments fronting the River Thames aligning with the Environment Agency Thames Estuary 2100 (TE2100) Plan. They will support Southwark in interpreting this data to ensure the revision of the borough Strategic Flood Risk Assessment.

NHS Southwark

147. NHS Southwark carried out a Health Impact Assessment (HIA) on the draft SPD. They identified both potential positive and negative impact that the SPD would have on health. They looked at the impact on the SPD on things such as health, mental health and wellbeing; impact on conditions that would indirectly affect health; affect on individual's own ability to improve their own health; and whether there will be a change in demand of health and social care. They identified many positive impacts such as the SPD helping to create an environment conducive to active travel having particularly positive effects for obesity, diabetes and cardiovascular disease. Similarly they identified that an increase in the number of well designed open spaces could enhance opportunities for exercise and children's play.
148. Some of the potential negative impacts identified included a possible negative impact on climate change due to increase population and large developments which may have an impact on global health. NHS Southwark also identified that a significant population increase will create an increased need for all health services and this needs to be planned.

NHS London Healthy Urban Development Unit

149. NHS London Healthy Urban Development Unit comment that there is no reference to analysis of current uses on the 43 development sites.
150. They support SPD2: Mixed town centre and SPD3: Public realm and open space.
151. They comment that they support paragraph 3.15 which looks to seek improvements to social infrastructure and keep the need for new infrastructure under review. They also comment that there is a need to address the intermediate and future impact of housing and population growth in the area. They would welcome an updated Development Capacity Assessment for the area.
152. They also comment that they support the intention to manage the provision of student accommodation as a concentration of student housing can have a significant impact on healthcare services.

KEY ISSUES FOR CONSIDERATION

153. A number of minor changes have been made to the final Blackfriars SPD to take into account comments raised through consultation and for clarity and consistency. The SPD has been reviewed and updated to ensure plain English is used throughout. The tracked changed Blackfriars SPD (Appendix C) shows the changes from the June 2013 draft SPD. The changes and the content of the SPD are summarised below.

Scope of the SPD

154. The SPD will be used to make decisions on planning applications alongside policies and guidance in existing policy documents. It provides more detailed guidance on the policies within the London Plan (2011), Core Strategy (2011) and the saved Southwark Plan (2007). It does not set new policy. This is set out within the SPD to ensure applicants and the community understand the scope of the SPD and that it must be read alongside other policy documents. The SPD has been updated to include an appendix cross referring to the borough wide Southwark policies and guidance which need to be read alongside this SPD.
155. The introduction has been updated in response to the representations received to explain more clearly why the SPD is needed, due to the scale of growth proposed and to ensure that the pressure for residential development is balanced with the need for a vibrant street. The SPD has been updated to make it clearer that most of the change will take place on the Blackfriars Road and that much of the surrounding area's character and historic value will continue to be protected, especially where there are conservation areas and listed buildings.
156. Wording has been added to the SPD to further explain that the Blackfriars Road lies mostly within the Bankside, Borough and London Bridge Opportunity area, with a small part at the southern end of the road falling within the Elephant and Castle Opportunity Area. Updates have been made to the SPD to set out that the Blackfriars Road SPD will replace the guidance for the Elephant and Castle SPD/OAPF for the overlapping area.

157. The SPD has been updated following consultation to make it clearer that neighbourhood plans are currently being prepared by the local community and that once adopted the neighbourhood plans will form part of Southwark's development plan and will be used to make decisions on planning applications.
158. The SPD boundary has been amended following consultation to extend slightly further south along the boundary of Thomas Doyle Street and Keyworth Street, as suggested by London South Bank University.

The vision for Blackfriars Road

159. Whilst SPD cannot set a new vision as it cannot create new policy, it can highlight aspirations for change. A new vision can then be adopted through the New Southwark Plan. The SPD has been factually updated to refer to the progress in preparing the New Southwark Plan and to link to the website for up-to-date information.
160. The ideas of the emerging vision include aspirations such as:
- Transforming Blackfriars Road to link Central London in Southwark as far as the Elephant and Castle with Central London north of the River.
 - Continuing to work with the many stakeholders to enhance the area.
 - Continuing to offer a mix of offices, services and shops.
 - Maximising opportunities to increase the amount and type of development.
 - Encouraging cultural, leisure, arts and entertainment uses.
 - Improved social and community infrastructure.
 - Ensuring that building heights respond to their context with a range of building heights with the tallest buildings at the northern end.
 - Working with Transport for London, to improve the road to make it safe, easier and more enjoyable for pedestrians and cyclists.
 - Improving the look and feel of the streets and public spaces.
 - Maximising opportunities to improve open spaces.

161. Updates have been made to the ideas for the emerging vision to take into account the comments raised in the consultation responses. The updates include:
- Making it clearer that the majority of change will take place on Blackfriars Road and that most of the surrounding area will continue to see little change and the character will be protected and enhanced.
 - Referring more specifically to the need to balance development with meeting the needs of existing and new residents to ensure that residents will benefit from the increased range of town centre and business uses.
 - Referring specifically to higher education.
 - Providing more detail on the potential improvements to the Blackfriars Road itself, making it safer and more encouraging for cyclists and pedestrians.

The strategies and guidance

162. The SPD sets out six key strategies to manage change.

SPD 1: Business space

163. SPD 1 sets out the approach to business space. It sets out that we will encourage the generation of jobs and businesses to help consolidate and

expand the existing business services cluster. Already there are many businesses on and around the Blackfriars Road, and this guidance will help to reinforce its location as a strategic office location and to encourage other businesses to set up offices here. SPD 1 requires existing business floorspace to be retained or replaced if a site comes forward for development, in line with existing policies in the Core Strategy and saved Southwark Plan. It sets out that any additional floorspace on sites already in business use can be used for other town centre uses including retail, leisure and entertainment facilities. SPD 1 also sets out that we support a range of uses in the railway arches, to build on the existing regeneration of the many arches.

164. Updates have been made to SPD 1 to make it clear that new business floorspace should be designed flexibly to accommodate a range of unit sizes including space suitable for small and start-up businesses to help meet a variety of needs. The “we are doing this because section” of SPD 1 has also been updated to cross refer to saved Southwark Plan policy 1.5 which aims to protect small business units. An update has also been made to refer to employment opportunities within the railway arches in line with Network Rail’s objectives.
165. A minor update has also been made to the “we are doing this because” section to refer to London South Bank University’s new Clarence Centre for Enterprise and Innovation.

SPD 2: Mixed use town centre

166. SPD 2 sets out the approach to creating a mixed use town centre. The area is already designated as a town centre, although there are currently limited town centre uses, particularly evening and weekend uses in parts of the SPD boundary. SPD 2 seeks to encourage a range of different town centres uses including shops, leisure and entertainment, bars, cafes, hotels and cultural uses alongside business uses, community facilities and housing to increase the amount of activity and encourage a wide range of occupiers and visitors. It supports proposals for new hotels, encourages a mix of arts, cultural and leisure uses, whilst ensuring that the impact of proposals are carefully considered, due to the close proximity to homes in much of the SPD area. It also supports the provision of new social and community infrastructure as part of mixed use development.
167. There were many representations raising that housing should be looked at through the SPD. The SPD purposely does not provide detailed guidance about housing because the borough wide policies and guidance in the Core Strategy, saved Southwark Plan, Affordable Housing, and Residential Design Standards supplementary planning documents already cover housing sufficiently. There is no differing approach for the Blackfriars Road. However, as previously set out in the draft SPD, housing is an appropriate use within town centres and thus SPD 2 has been updated to include residential into the bullet point on encouraging a range of uses. The supporting text has also been updated to make it clearer that there is residential development in the area, that more people will be living there in the future and that the increased provision of town centre uses will benefit residents. The fact box on town centre uses has also been updated to make this clearer by referring to the updated definition of town centre uses in the National Planning Policy Framework. An appendix has also been inserted to cross refer to the key Southwark plan policies including those on housing.

168. An update has been made to make it clearer that space should be designed flexibly to accommodate a range of units sizes, in order to be consistent with SPD 1.
169. It has also been made clearer that opportunities to increase and improve the range of infrastructure and facilities will be maximised referring specifically to health facilities and community facilities, as these were issues raised in a number of representations.
170. SPD 2 sets out that we will consider the impact of all proposals for food, drink, evening and night time economy uses on the overall mix of the area and on local amenity. Text has been added into the “we are doing this because” section to cross refer to the Borough and Bankside licensing saturation area.

SPD 3: Public realm and open space

171. SPD 3 seeks to improve the public realm and open spaces by working with our many partners to provide a high quality design of public squares, streets and spaces. It sets out principles for all of the SPD area to include principles such as requiring public realm to create clearly defined streets, enhance local distinctiveness and to provide new links for pedestrians and cyclists. It also sets out additional principles for Blackfriars Road, the Thames Path and St George’s Circus.
172. Minor changes have been made to SPD 3 to ensure consistency as well as making it clear the new links should enhance wayfinding. Bankside Open Spaces Trust has been added to the list of groups that we work with in delivering this guidance. The architects Allies and Morrison have prepared a set of public realm principles for Blackfriars Road that been incorporated within SPD 3.
173. The “we are doing this because” section of SPD 3 has been updated to include new text cross referring to the Open Space Strategy (2013) and how we will work with developers to encourage new open space provision on development sites in lines with the recommendations in the Strategy.

SPD 4: Built form and heritage

174. SPD 4 sets out more detailed guidance on built form and heritage to ensure a high quality design and architecture, reinforcing the area’s character and distinctiveness. This includes guidance on enhancing the historic environment and ensuring inclusive design principles are applied.
175. English Heritage and a number of other representations raised the issue of needing to “complete” the Circus and to reinforce its geometry and character. SPD 3 already refers to this for public realm schemes. SPD 4 has been updated to also refer to this aspiration for development to reinforce the geometry and character of the Circus.

SPD 5: Building heights

176. SPD 5 provides further guidance on building heights. It sets out that development should reinforce the civic character of Blackfriars Road, Stamford Street, Southwark Street and the river front. It establishes a general principle of appropriate heights of up to 30 metres along these main routes, with heights on streets off these main routes generally needing to be lower to fit in with their surroundings. It also sets out places along Blackfriars Road where taller buildings will be encouraged. The guidance sets out that the tallest buildings should be at the north end of Blackfriars road, with the tallest heights being set

back from the river, and focused around the junction of Blackfriars Road, Stamford Street and Southwark Street. It sets out that a tall building of up to 70 metres should provide a focal point at Southwark tube station, and similarly a tall building of up to 70 metres could provide a focal point at the southern end of Blackfriars Road towards St George's Circus, being set back from the Circus itself. SPD 5 also provides detailed guidance on the design principles that all tall buildings must meet, as well as meeting the criteria in saved Southwark Plan policy 3.20.

177. A large number of representations were received objecting to this guidance, as summarised above. The responses objecting to the guidance are mixed. Local residents and groups are opposed to the SPD 5 particularly the guidance referring to the potential for taller buildings of up to 70 metres at Southwark Station and at St George's Circus. They feel the appropriate height should be much lower. Some objectors also contend that the SPD guidance is contrary to the development plan. English Heritage's comments are summarised in paragraphs 138-154,. Many developers and landowners felt that the guidance is too prescriptive and should not include a limit on building height. Similarly the Greater London Authority feels that the guidance should be amended to say "in the region" rather than "up to" 70 metres.
178. The policy approach within the SPD is considered to be consistent with the NPPF (2012), the London Plan (2011), the Core Strategy (2011) and the saved Southwark Plan (2007), taking into account changes in the surrounding context since developing the Core Strategy vision in 2009/2010. The London Plan, Core Strategy and saved Southwark Plan form the development plan for Southwark, with the NPPF setting out national guidance. The development plan sets out the policies for tall buildings. Key policies are: London Plan policy 7.7 which identifies that tall and larger buildings should generally be limited to sites in the Central Activities Zone, opportunity areas, areas of intensification or town centres that have good access to public transport. Blackfriars Road lies within the Central Activities Zone, is an opportunity area and a town centre with good access to public transport. Core Strategy strategic policy 12 requires tall buildings to have an exemplary standard of design and identifies locations where tall buildings could go. The Core Strategy vision for Bankside and Borough refers to the council setting out in detail which sites are appropriate, sensitive and inappropriate for tall buildings through the supplementary planning document/opportunity area framework. Saved Southwark Plan policy 3.20 sets out criteria for considering applications for tall buildings and applies across the borough
179. The guidance in the Blackfriars Road SPD provides detail on how to implement these development plan policies specific to Blackfriars Road. This approach is supported by our evidence base including the Blackfriars Road Urban Design Study (Appendix I) which has been prepared in accordance with CABI and English Heritage "Guidance on Tall Buildings", 2007.
180. Minor changes have been made to SPD 5 following consultation. These are shown as tracked changes in Appendix C.

SPD 6: Active travel

181. SPD 6 provides guidance on active travel, setting out the many groups we will work with to encourage active travel by making the area more attractive and safer, with better connections. It sets out improvements to walking and cycling

routes, specifically through working with TfL to make significant improvements to Blackfriars Road itself. It also sets out aspirations to increase east-west linkages.

182. The SPD has been updated to refer to work being carried out by Transport for London to create a segregated route for cyclists as well as improving links between the different modes of transport. The architects Allies and Morrison have prepared a set of public realm principles for Blackfriars Road that have been incorporated within SPD 6.

Implementation

183. The final section of the SPD sets out information and guidance on how the aspirations and vision for Blackfriars Road will be delivered. It sets out information on partnership working, business involvement and community involvement, setting out a commitment to continue to work with all the different groups.
184. It also provides guidance on how change will be managed through mechanisms such as management plans during and post construction to ensure the development is coordinated and has minimal impact on residents.
185. It also sets out the need to continue to improve infrastructure, cross referring to the Community Infrastructure Levy and section 106 planning obligations.
186. Factual updates have been made to the implementation section to reflect that further sites now have planning permission and that more sites may come forward in the future.
187. The reference to the map and list of potential development sites has been moved to the section on implementation. The figure and list has been updated following consultation to include some new sites, amend site boundaries and to correct errors. Wording has been added to the SPD to make it clearer that the map and list are not exhaustive and that some sites may be completely redeveloped whilst others may experience less change. The list has also been updated to remove the column referring to the status of each site as this will quickly become out of date once the SPD is adopted.

Community impact statement

188. The purpose of the SPD is to provide a strategic framework and detailed guidance to coordinate growth along and around the Blackfriars Road. This SPD will ensure that development occurs in an appropriate and desirable way, improving Blackfriars Road as a destination where people want to live, work and visit.
189. An equalities analysis (Appendix E) has been carried out to assess the impact of the SPD on the nine protected characteristics. It is recognised that the SPD guidance may have many similar impacts on these different group of people who have protected characteristics. One of the potential positive impacts of the guidance is that the guidance is the creation of an enhanced public realm that is safe, well-lit and inclusive is likely to improve accessibility for those with a physical disability and also promote wider community inclusion. A potential negative impact of the guidance is that the encouragement of taller buildings may have a less positive impact on certain groups such as those with young children or disabled people. This potential issue is mitigated through existing policies

ensuring that family housing is provided with adequate private amenity space and through our wheelchair standards and Lifetime Homes guidance

190. We also carried out equalities analysis for the guidance in the draft Bankside, Borough and London Bridge SPD (2010) and the adopted Elephant and Castle SPD/OAPF (2012), which the Blackfriars Road SPD area fails partly or completely within. The findings of both of these analyses have help inform the guidance that we have prepared in the Blackfriars Road SPD.
191. A sustainability appraisal (Appendix F) has also been prepared that assesses the impact of the draft SPD on social, economic and environmental sustainability. The sustainability statement (Appendix G) summarises how the SA has been taken into account in finalising the SPD.
192. The preparation of a scoping report was the first stage of the sustainability appraisal to assist in the preparation of the SPD and its sustainability appraisal. The SA for the Blackfriars Road SPD follows on from the scoping report that was carried out for the Borough, Bankside and London Bridge Opportunity Area. We consulted on the scoping report in November 2012 and the comments received on this have fed into the preparation of the Blackfriars Road SA and SPD. This scoping report sets out the sustainability objectives and indicators that will be used to measure the impacts of future guidance upon sustainable development. Baseline information was gathered to draw attention to key environmental, social and economic issues facing the borough, which may be affected by development along and around Blackfriars Road.
193. The results of the appraisal show that the overall impact of the guidance set out in the SPD is more positive in terms of promoting a more distinctive and varied a mix of uses which in the long term would help promote sustainable communities. The guidance will help to ensure there is a more balanced approach to the redevelopment of the area by focusing on providing employment opportunities, improvements to the public realm and high quality new homes. Whilst this growth will increase demand for energy, water and generate more waste and traffic these impacts can all be mitigated by other measures which seek to reduce car parking, set energy guidance and design guidance.
194. The SA informed the preparation of the SPD. The - sustainability appraisal statement (Appendix G) summarising how the SA has informed the final SPD. For every topic, the positive impacts outweighed the negative impacts when assessed across the whole range of sustainability objectives. In some cases the guidance has no significant impact with the sustainable objectives. Where the SA identified potential shortcomings of particular guidance, mitigation measures are proposed to help off-set the negative impacts. Many of these mitigation measures are policy requirements in either the Core Strategy or saved Southwark Plan. For example: Strategic Policy 13 in the Core Strategy, which sets out the council's targets for development to minimise their impacts upon climate change and Strategic Policy 2 on Sustainable Transport

Financial implications

195. There are no immediate resource implications arising from this report as any additional work required to complete the work will be carried out by the relevant policy team staff and budgets without a call on additional funding.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Legal Services – JG/11/13

196. It is not possible for a Supplementary Planning Document to set new policy. However, SPDs can provide detailed technical guidance on particular areas or themes where these are able to assist in the delivery of the development plan policies.
197. This is recognised in paragraph 2.2.3 of the SPD which explains that the SPD is essentially setting out a range of ideas which will be developed further during the course of the preparation of the new Southwark Plan. The report emphasises that the SPD cannot be used for site allocation and it must conform to the policies not only in the Core Strategy and the saved Southwark Plan policies but also in accordance with the London Plan.
198. The equalities analysis appended at Appendix E has considered the impact of the SPD on groups who may be at risk of discriminatory treatment and has had regard to the need to promote equality amongst communities within the borough. Indeed, it is recognised that some of the consequences of the SPD will be beneficial with the example given of the improvements to the public realm.
199. Furthermore, whilst a sustainability appraisal is no longer strictly required for new SPDs following the provisions of the Planning Act 2008, an appraisal has been undertaken in this instance on the basis that the SPD refers in some instances to the Southwark Plan which itself was not the subject of a sustainability appraisal. The appraisal carried out for this SPD is contained at Appendix F.
200. The decision to adopt the SPD is a decision for the Full cabinet in accordance with paragraph 21 of Part 3C of the Constitution.

Strategic Director of Finance and Corporate Services

201. The strategic director of finance and corporate services notes that there are no new financial implications as a result of accepting the recommendations of this report. Officer time to implement this decision can be contained within existing resources

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
London Plan 2011	Southwark website	planningpolicy@southwark.gov.uk
Link http://www.london.gov.uk/priorities/planning/londonplan		
Southwark Statement of Community Involvement 2008	Southwark website	planningpolicy@southwark.gov.uk
Link http://www.southwark.gov.uk/info/856/planning_policy/1238/statement_of_community_involvement_sci		

Background Papers	Held At	Contact
Saved Southwark Plan 2007	Southwark website	planningpolicy@southwark.gov.uk
Link http://www.southwark.gov.uk/info/856/planning_policy/1241/the_southwark_plan		
The Core Strategy 2011	Southwark website	planningpolicy@southwark.gov.uk
Link http://www.southwark.gov.uk/info/200210/core_strategy		
National Planning Policy Framework 2012	Southwark website	planningpolicy@southwark.gov.uk
Link https://www.gov.uk/government/publications/national-planning-policy-framework--2		
Bankside, Borough and London Bridge Characterisation Study 2013	Southwark website	planningpolicy@southwark.gov.uk
Link http://www.southwark.gov.uk/info/200272/evidence_base/1616/design		

APPENDICES

No.	Title
Appendix A	Blackfriars Road supplementary planning document, 2014 Hard copy provided with the report
Appendix B	Representations received and the officer comments. Available on the council's website on the link below:
Link http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=4554&Ver=4	
Appendix C	Tracked changed version of the Blackfriars Road supplementary planning document, 2014 Available on the council's website on the link below:
Link http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=4554&Ver=4	
Appendix D	Consultation report Available on the council's website on the link below:
Link http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=4554&Ver=4	

No.	Title
Appendix E	Equalities analysis Available on the council's website on the link below:
Link http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=4554&Ver=4	
Appendix F	Sustainability appraisal Available on the council's website on the link below:
Link http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=4554&Ver=4	
Appendix G	Sustainability appraisal statement Available on the council's website on the link below:
Link http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=4554&Ver=4	
Appendix H	Appropriate assessment Available on the council's website on the link below:
Link http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=4554&Ver=4	
Appendix I	Urban design study Available on the council's website on the link below
Link http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=4554&Ver=4	
Appendix J	Business and retail background paper Available on the council's website on the link below:
Link http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=4554&Ver=4	

AUDIT TRAIL

Cabinet Member	Councillor Fiona Colley, Regeneration and Corporate Strategy	
Lead Officer	Eleanor Kelly, Chief Executive	
Report Author	Alison Squires, Planning Team Leader	
Version	Final	
Dated	16 January 2014	
Key Decision?	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments Included
Director of Legal Services	Yes	Yes
Strategic Director of Finance and Corporate Strategy	Yes	Yes
Cabinet Member	Yes	Yes
Date final report sent to Constitutional Team	16 January 2014	