

Item No. 4	Classification: Open	Date: 18/10/04	MEETING NAME PLANNING COMMITTEE
Report title:		POTTER'S FIELD PLANNING BRIEF	
Ward(s) or groups affected:		RIVERSIDE	
From:		STRATEGIC DIRECTOR OF REGENERATION	

RECOMMENDATION

1. That the draft Potter's Field Planning Brief as set out in Appendix A be adopted for development control purposes.

BACKGROUND

2. A planning brief has been prepared for the site referred to as Potter's Field, bounded by Potter's Field Park, Tower Bridge Road and Queen Elizabeth Street (excluding Bridgemaster's House). The purpose of the brief is to give planning advice on the council's expectations for the use of the sites, and guidance as to the standard of design required, and the special role of this site within an important heritage context.
3. Planning Committee approved a draft planning brief for consultation purposes on March 26 2002. Following revisions to address consultee responses and to bring the document up to date with emerging policy and circumstances, a final brief was adopted by committee on May 13 2003. It was subsequently withdrawn. Further amendments were made and it was consultation was carried out on between the August 27 and September 21 2004.
4. The council owned portion of the coach park site is subject to a legal agreement dating from May 1982. This includes a covenant between the council and (now) Berkeley Homes that the Council will 'use its best endeavors' to implement a residential scheme comprising the construction of 'not less than 450 nor more than 456 habitable rooms of residential space' with the 'residential developer' defined as 'the council, housing association or other like body or agency as the council may direct'. This part of the site is also subject to a restrictive covenant requiring it to be used for residential purposes only.
5. The brief site, excluding the Corporation of London site, is subject to a number of current planning applications. These were considered at a public inquiry during April, May and June 2004. A decision is pending and the Inspector indicated that he would send his report to the Secretary of State around the end of October 2004 for a final decision at a later date. The applications are for;
 - 1) Full application - 8 buildings (ranging from 11 storeys to 18 storeys, plus ground and mezzanine) on the coach park site with D1, A or B1 uses at ground and part basement and first floors, and residential on the upper floors and a new building (part 5, part 7 storey, plus ground and mezzanine floors) on the corner of Tower Bridge Road and Queen Elizabeth Street, again with D1, A or B1 uses at ground and part basement and first floors, and residential on the upper floors and a new building;

- 2) Full application - just the development described above on the corner of Tower Bridge Road and Queen Elizabeth Street.
 - 3) Listed building consent - demolition of the 1930's college annex within the curtilage of Lambeth College listed building.
6. The former coach park site is designated on the Proposals Map of the adopted UDP (July 1995) and listed in Chapter 9 Proposals Schedule as; Proposal Number - 13; Policy Reference - H.1.3; and Proposal - Housing.
 7. Two of the sites within the brief area are designated on the proposals map of the 2nd deposit plan (March 2004). The former coach park is listed in Appendix 4 Proposals Sites Schedule as; reference number - 3P; uses required - A large arts or cultural use of London or nation-wide importance which would act as a significant attraction in its own right; other acceptable uses - i. D1 Use Class ii. A Use Classes at ground floor only iii. Residential use that is subordinate to the main arts or cultural use; uses not allowed - Any other uses; Notes - Further guidance in Potter's Field Planning Brief. Objections to this designation have been received from Pool of London Partnership, Berkeley Homes, St Martins Property Corporation Limited and Storm Poorun of the Southwark Green Party.
 8. The brief sites are also within areas referred to in the London Plan which have specific policies and guidance - Central London, Central Activities Zone and London Bridge Opportunity Area.

KEY ISSUES FOR CONSIDERATION

9. In making its decision, members are asked to have regard to the following;
 - 1) The status of the planning brief in considering future planning applications and its relationship to other policy documents,
 - 2) The impact of the planning brief on potential development on the site,
 - 3) Consultation responses,
 - 4) The 1982 legal agreement relating to the council owned part of the former coach park,
 - 5) The inspector's decision on the Royal Opera House proposal for the former coach park site
 - 5) The pending applications for the former coach park and Lambeth College sites.

Policy implications

10. Once adopted, the brief will be a material consideration when considering any planning application for development within the brief site. A planning brief is a stepping stone between the provisions of the development plan and the requirements of a planning application¹. It is given more weight if it is adopted as Supplementary Planning Guidance and is consulted on and adopted by Council resolution. However, SPG must be consistent with the development plan, in the case of Southwark is the adopted 1995 UDP and the London Plan. In the case of the former coach park there is an inconsistency in the most

¹ Planning and development briefs: a guide to better practice ODPM

appropriate mix of uses. While the 1995 UDP designates the site for a housing proposal, the London Plan policies and guidance prioritises arts/cultural use contributing to tourism.

11. The weight to be afforded to the brief will be determined at the time any future planning applications are made. This will change over time as the status and weight of other policy documents such as the 2nd deposit Southwark Plan changes. When considering any planning application for the brief site, the decision must be made in accordance with the adopted Plan (currently the 1995 UDP) and the London Plan, unless material considerations indicate otherwise². Material considerations include whether the plan policies are relevant and up-to-date³, the planning brief and many other factors, some of which are outlined below.
12. Adopted 1995 UDP: The planning brief does not accord with the designation of the adopted Unitary Development Plan. This will be taken into account at planning application stage for any development depending on the status of this document at the time.
13. However, it is noted that between the start of 1997 and mid 2004 over 8000 additional dwellings have been created in the borough, excluding any developments of less than 10 units which are estimated to be a further 2000 or more new homes. Additionally, sites have been identified to provide a further 11,700 to over 16,000 new homes in the period to 2016⁴. Therefore, without taking windfall sites or non-self contained housing into consideration, the Council can achieve about 73% to 88% of its housing target without a significant residential element on the brief site. Net housing completions in the future will also be greater as the redevelopment of the North Peckham Estate resulted in the net loss of over 1,000 homes, which has almost been completed. Finally, there has been a sharp increase in the number of residential permissions since 2002 coinciding with the increased densities suggested in the (then draft) London Plan. This will also be a material consideration to be weighed against the designation in the 1995 UDP.
14. Permission was given in 1996 for an opera house on the former coach park site with no residential element. The Inspector found that, weighed against the designation for housing, a departure to the UDP was justified. This will also need to be taken into account when affording appropriate weight to the planning brief at the time of any planning application. The Inspectors justification for this was that *"The site required an imposing public building of significant architectural design, and preferably one contributing to the developing role of the area for tourism and public activity, thus offering economic and community benefits to this part of Southwark"*⁵ The transformation of the southern bank of the Thames as a major leisure destination must also be taken into account.
15. The London Plan: The planning brief accords with the London Plan. The most specific guidance for the sites relates to the London Bridge Opportunity Area which states that "The planning framework should draw visitors eastwards along the riverside."⁶ The Potter's Field site with its unique location and features is the best and only significant opportunity to achieve this. Further, the London Plan includes indicative estimates of

² Section 54A Town & Country Planning Act 1990

³ Planning Policy Guidance 1: General Policy and Principles

⁴ Pre-Inquiry modifications to the 2nd deposit plan estimated housing capacity Appendix 4 and Part 1 Section 10.5

⁵ Inspector's Report, Royal Opera House Covent Garden Ltd and Greater London Enterprise Property Developments Ltd, July 1996

⁶ London Plan 2004 paragraph 5.33

housing in the London Bridge Opportunity Area of only 500 new homes⁷ and housing is clearly not a priority in this area.

16. Other strategic priorities for Central London⁸ prioritise culture, leisure, housing (including maximising the number of additional homes by exceeding targets) and mixed-use development. If estimates of past developments of less than 10 units and figures for non self contained housing are extrapolated over the next 20 years, between 96% and 110% of the target will be achieved. This is without any development of over 10 units on windfall sites (sites not designated in the 2nd deposit Plan). For this reason, the council is confident of exceeding its housing target as required in this policy. Further, the brief allows for mixed use development on the site including a residential element. However, this is secondary and subordinate to the main use to which this site is uniquely suited; that of providing an arts/cultural use related to tourism.
17. More specifically, the Central Activities Zone (as designated in the 2nd deposit Plan) states that boroughs should accommodate (among other things) tourism subject to the protection of housing. As the site has no housing to be protected, there is no special priority for housing imposed on the site as a result of this designation.
18. Second Deposit Plan: The planning brief accords with the 2nd deposit plan including its designation of two of the sites. The brief advises that Lambeth College should be a D1 Community Use (including a “school, library, or some form of arts or cultural use”), and the vacant land on the corner should also be D1 Community Use.
19. Planning Policy Guidance 3: Housing 2002: Objectors to the brief have raised the increased prioritisation of housing as a result of PPG3 Housing. This prioritises meeting the housing needs of the community, and at a regional level. Homes should be provided in as far as possible on brownfield sites, with higher densities around transport nodes. It also requires that boroughs regularly review sites designated for non-housing use, and release any for housing that is not needed for other purposes. As noted above, the council has made provision to meet their housing targets set at a regional level. All development sites in Southwark are brownfield, and the designations for housing and policies in the 2nd deposit Plan provide for increased densities around transport nodes, including the specific PTAZ designations. The PPG does not offer any specific guidance for the former coach park site. It states that housing sites should meet certain criteria: not that all sites that meet those criteria should be housing.
20. Because of those considerations outlined above, it is considered appropriate to proceed with the adoption of the planning brief at this stage. While it does not accord with the adopted UDP designation there is an inconsistency between this and the priorities in the London Plan. It is considered that the adopted UDP designation is out-of-date, and has been almost since its adoption (as demonstrated by the permission for the Royal Opera House in 1996), as it fails to maximise the potential of one of London’s most important sites for the benefit of Southwark and London as a whole. The brief does accord with up-to-date policy and guidance in the London Plan and therefore is partially in accord with the development plan.

⁷ The London Plan 2004, Table 5B.1

⁸ A broad area comprising the five boroughs of Kensington & Chelsea, Islington, Wandsworth, Lambeth, Southwark and the City of Westminster.

Implications for Land-Use

21. Planning guidance should only be adopted where there is a reasonable prospect of its implementation. Implementation of the brief as it relates to the council owned part of the former coach park must take the 1982 legal agreement into account. As noted above, the positive covenant requires the council to use its best endeavors to provide a residential development of between 450 and 456 habitable rooms on the site, and the restrictive covenant requires that no other use than residential are allowed on the site. The council is currently pursuing appropriation of the site for planning purposes⁹. Advice from Counsel is that this will negate the effect of the restrictive covenant. The council is also intending to submit a planning application that complies with the positive covenant. Indications are that such an application is unlikely to be acceptable on planning grounds. If this is correct, this would satisfy the positive covenant.
22. Representatives for Berkeley Homes at the public inquiry also challenged the likelihood of delivery of a large arts/cultural development of a scale that would satisfy the brief. This objection is based on the significant decline in funding for this type of development since 2000, the lack of evidence from the council of interest from prospective users and the poor financial performance of many of these uses. The council has not been in a position to formally market the site because of the legal agreement discussed above. However, the council has had several informal and confidential enquiries from prospective users who, either singly or with other users would meet the requirements set out in the brief. Therefore the council is confident that there is a reasonable prospect of implementation and the adoption of the brief is therefore appropriate.
23. As the planning brief will be a material planning consideration for any future applications for the brief sites, it will have implications for the type of uses on the sites and the design of any development on the sites (including coordination between the sites to maximise their potential). The effect of the brief would be to significantly restrict the amount of residential development on the former coach park and will not allow residential use on the Lambeth College site.
24. The sections relating to design give guidance for developers by identifying site specific characteristics that must be taken into account. However, without the brief, these matters would still need to be taken into consideration in order to comply with the development plan, Government guidance and the 2nd deposit Plan. Therefore the brief offers further guidance with regard to design matters, but does not place any additional restriction or requirement on development.

Resource/Financial Implications

25. Funding of the printing and consulting of the planning brief has been met entirely within revenue budgets.
26. The brief does have financial implications for the council in terms of the development of that part of the site which it owns. However, this has been accepted by Council Assembly through the designation of this site in the 2nd deposit Plan.

⁹ Get Exec dates from Toby

Consultation Responses

30. Four responses were received to the latest consultation on the planning brief. These were from Berkeley Homes, Historic Royal Palaces, Pool of London and St Martins Property. The responses are outlined in full in Appendix 2 to this report, together with officer comments.
31. Previously, 12 consultee responses had been received, including from the same consultees as those referred to above. Responses were in the main from key statutory consultees, heritage and interest groups, key landholders, and private parties, including an arts organisation. These will be made available to members at the committee meeting.

Other factors

27. Although there are outstanding planning applications for two of the brief sites, these do not disable the council from exercising its powers as a local planning authority. These planning applications have been considered in the absence of a planning brief and prior to the consultation period on the 2nd deposit Plan. Additionally, the council now has significantly more information regarding housing completions and capacity than it did at the time of the public inquiry. This information indicates that the council can exceed its housing targets. However, if the inspector for the UDP Inquiry in 2005 finds that the designations relating to the brief site cannot be justified, the brief will need to be revisited.
28. The brief will give major arts/cultural users confidence to locate on the former coach park site as it gives up-to-date guidance to support the London Plan and 2nd deposit Plan. It is expected that this policy guidance will be a stimulus for development of this key site, also contributing to broader regeneration objectives including re-branding of this part of the riverside and stimulating wider investment similar to the effect of the Tate Modern.
29. The site is reasonably distant and physically separated from neighbouring sensitive uses such as the flats at Devon Mansions. Accordingly, it is considered that any increase in activity associated with any redevelopment can be absorbed without undue impact on residents. Vehicles will access the site off Tooley Street, an 'A' classified road with sufficient capacity. The large numbers of visitors using public transport or walking to the site from other attractions would be most likely to use the riverside walkway with minimal impact on surrounding occupiers.

Summary

30. On balance, and taking all the above considerations into account, together with the consultation responses to the brief, it is recommended that the Potter's Field Planning Brief be adopted. Despite development plan and legal constraints on the former coach park, it is considered that there are sufficiently reasonable prospects of delivery of the brief to justify its adoption.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Borough Solicitor & Secretary

31. The advice of the Borough Solicitor and Secretary will be made available to members at the committee meeting.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Previous Potter's Field Planning Brief Case files	Planning Policy Team Chiltern House	Lisa O'Donnell

APPENDIX A

Audit Trail

Lead Officer	STRATEGIC DIRECTOR OF REGENERATION	
Report Author	Lisa O'Donnell Principal Planning Officer	
Version	<i>Final</i>	
Dated	October 8 2004	
Key Decision?	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / EXECUTIVE MEMBER		
Officer Title	Comments Sought	Comments included
Borough Solicitor & Secretary	Yes	No
Executive Member	Yes/No	Yes/No
Date final report sent to Constitutional Support Services		

APPENDICES

Appendix 1 Potter's Field Planning Brief

London Borough Southwark

Potter's field planning brief

Land bounded by Potter's field, Tower Bridge Road and Queen Elizabeth Street, SE1

DRAFT PLANNING BRIEF COPY FOR CONSULTATION

Regeneration Department
Council Offices
Chiltern House
Portland Street
London SE17 2ES



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OBJECTIVE OF PLANNING BRIEF

- 1.1 This planning brief has been prepared for two principal reasons;
- (i) To achieve an outstanding standard of design quality on this prominent site. This will positively contribute to the Thames-scape, the character and appearance of the three conservation areas covering and in the immediate vicinity of the Brief Site, and will enhance the setting of the various listed buildings and structures in the vicinity, most notably Tower Bridge and the Tower of London which is a World Heritage site. The importance of this site, requires exemplary world class architecture;
 - (ii) To clarify the types of uses and development which would be acceptable and/or desirable on this site. This relates to the increasing status of the South Bank as a tourist destination and will address the apparent inconsistencies between the Unitary Development Plan designation for housing, the 1996 appeal decision approving the redevelopment of the site for a theatre and the priorities set out in the London Plan for this area.
- 1.2 The planning brief covers three sites, two of which are essentially brownfield, and one which is occupied by two buildings and has an established use as a college [D1 Use Class]. It is expected that the inclusion of all three sites will ensure an overall mix of uses and design quality that compliment each other. It is also hoped that a development brief which covers all three sites will enhance the overall layout and allow for a more efficient use of the land available.
- 1.3 The adopted planning brief will be the **key** material consideration in any future development on the sites. It is consistent with the most up to date guidance, but gives greater detail and more specific advice in relation to the aspirations, constraints and considerations for the sites. As such, it should **be taken into account when preparing underpin** any development brief, site analysis or architect's brief for the site.

DESCRIPTION OF SITE AND LOCALITY

- 2.1 The Brief Site comprises three separate sites currently occupied by the Lambeth College, a former coach and car park and an operational service yard.
- (i) **Potter's Field Site:** The northern part, and majority of the Brief Area is undeveloped and was most recently used as a coach and car park subject to a planning permission granted by the LDDC and renewed most recently on the 19th May 2000. This latest permission expired on the 17th July 2002. Part of the site is owned by the London Borough of Southwark and part of the site is owned by Berkeley Homes.
 - (ii) **Lambeth College Site:** The southern third of the site is currently occupied by Lambeth College, and comprises a three/four storey Grade II listed building, and a smaller three storey building. Lambeth College was originally built as a St Olave's and St Saviours Grammer School in 1893 and has remained in educational use since this time. The vacant site on the corner of Queen Elizabeth Street and Tower Bridge Road was most recently used for hot air balloon rides however permission for this expired at the end of March 2001. This site is currently owned by Berkeley Homes.
 - (iii) **Corporation of London site:** A third site comprises a strip of land with a ramped access off Tower Bridge approach. This site is owned by the Corporation of London and is currently in use as a servicing yard for Tower Bridge.
- 2.2 The entire brief site is bounded by Queen Elizabeth Street to the south, and Tower Bridge Road, including the Tower Bridge Approach, to the east. The Bridgemaster's House, a Grade II listed building also lies on this eastern side, sandwiched between the Brief Site and Tower Bridge Approach. To the north and west lie Potter's Field Park and beyond this lies the River Thames and the More London development site. The entire site comprises approximately 1.52 hectares, and is accessed from Potter's Fields, an access road in the south west corner of the site between Lambeth College and Potter's Fields Park. The Corporation of London site has a separate ramped access directly off Tower Bridge Approach.
- 2.3 Other projects currently being considered in the vicinity are the redevelopment of Potter's Field Park to create an exceptional public space as befits the location, the completion of the More London development which includes the Unicorn Theatre, one of only two children's theatres in London, works to St John's Churchyard, improvements to Tooley Street in the immediate vicinity of the Brief Site, and various other lighting, signage and road work schemes to improve the environment and legibility of the area.

HERITAGE CONTEXT

- 3.1 Lambeth College is within the Tower Bridge Conservation Area. This conservation area forms the eastern boundary of the remainder of the Brief Site, but also includes the Bridgmaster's House. The Tooley Street North and South conservation areas lie to the south and east of the site, extending along both sides of Tooley Street.
- 3.2 There are numerous listed buildings and structures in the vicinity, including those discussed above. The site is adjacent to Tower Bridge, Grade I listed and one of the most internationally recognised structures, and important tourist destinations, in London. The site mirrors the Tower of London on the opposite side of the Thames, a Grade I listed building and one of only three World Heritage Sites within London. Flanking the bridge approach is the Bridgmaster's House to the west, and a listed accumulator tower and chimney on the eastern side of the approach. A Grade II listed bank lies opposite Lambeth College, as does a Grade II listed statue and three listed bollards are found within Potter's Field Park at the entrance to the site. Beyond this are a listed watch house in Fair Street and the Magistrates Court in Tooley Street. Overall this is a particularly sensitive site, surrounded by three conservation areas and a significant number of listed structures, including those of national and international importance.
- 3.3 The archaeological investigation for the More London site revealed important remains dating from the prehistoric, medieval and post-medieval periods. The eastern edge of the More London site, together with much of the brief site formed part of the Horselydown eyot (buried island) which was occupied at various times since the Bronze Age. Therefore it is highly likely that the site has significant archaeological remains. The Council will ensure that the archaeology is properly addressed but it is the responsibility of the site developer to commission the necessary archaeological works. In the likely event of remains being found, more extensive excavation may be required and the remains may be required to be preservation in situ.

PLANNING HISTORY

Wider Planning History

- 4.1 The Brief Site forms the third and final phase of extensive re-development between London Bridge and Tower Bridge. This area was formerly warehousing with some affordable housing blocks, and had an urban grain similar to that on the eastern side of Tower Bridge around Shad Thames. Demolition of these buildings began in the early 1970's and various permissions were granted for temporary car parking on the vacant sites.
- 4.2 Outline planning permissions covering much of the area between the two bridges, the river and Tooley Street, but excluding the Potter's Field site, a total of 22 hectares, were granted in January 1994 by the London Docklands Development Corporation (LDDC). This provided for the Riverside Walkway and the laying out of Potter's Field Park. Phase I of the development was completed in 1987, extending as far east as Southwark Crown Court.
- 4.3 The final masterplan for Phase II of the development, commonly referred to as More London, was approved on 19th August 1999. This comprised the new City Hall at the eastern end of the site which is now occupied, and 9 other buildings ranging from about 5 to 10 storeys. The site is predominantly for office use with ground floor commercial, but will also include a hotel, children's theatre, a supermarket and a gymnasium. Over 50% of the site has been left as public open space, including a wide pedestrian link that cuts diagonally through the site from Tooley Street and London Bridge Station, through to a large public square at the head of this walkway, terminating at City Hall and the Riverside Walkway.
- 4.4 As the More London development lies on the opposite side of Potter's Field from the Brief Site, it will have a significant impact on the Brief Site. It opens up a safe and quick route to London Bridge Station, significantly improving the public transport links. The unusual design of the City Hall will also have a bearing on the design appropriate on the Potter's Field site.

Planning History of Potter's Field Site

- 4.5 **An application was made in May 1994 for the development of the Potter's Field site for 135 flats within a 9 storey building. The design by Alsop & Störmer was dubbed the "Worm on Stilts". It was called in by the Secretary of State but a decision was deferred pending a decision for a second application for a theatre application on the same site. A decision on the residential development was never finalised.**
- 4.6 **The theatre application was put forward by the Royal Opera House to provide decant accommodation while their Covent Garden premises were being redeveloped. The proposed building designed by Ian Ritchie had a seating capacity of approximately 2,300 people, with an orchestra capacity for 90 musicians. It included a main stage, two side stages, a fly-tower, and ancillary facilities including a periodicals library and café. The design was simple and box-like, constructed of two principal surfaces of glass and stone bound in stainless steel mesh.**

4.7 Permission for the theatre was granted following a Public Inquiry. In his decision the Inspector commented that;

“It is not disputed that the...site is in need of regeneration and visual improvement: it is one of the sites specifically identified (No. 22) in both the Thames Strategy and the draft Strategic Guidance (for the Thames). Whilst accepting that an imaginative housing design could exploit the site’s potential, I find considerable merit in the Council’s argument that this high profile site next to Tower Bridge and opposite a World Heritage Site is uniquely well suited to a major public building. This is a “trophy” site of London-wide significance, and it calls for a building of special character and high architectural quality...There is particular merit in an evening use which contributes to the life and attractiveness of the area at a time when the surrounding office uses are dormant.”

4.8 The Inspector commented on the housing designation in the adopted Unitary Development Plan. He also noted that this site was not crucial in meeting the housing targets of the Borough and that housing should not be sought irrespective of other planning considerations. He pointed out that the designation for housing stemmed from the planning permission which was in place at the time, and that it was an alternative, but not an ideal use of the site. Finally, he noted that the land was provided as compensation for the loss of affordable housing, but a wholly affordable housing development was unlikely due to the considerable design and build costs required to develop such an important site.

PLANNING POLICY FRAMEWORK

Southwark Unitary Development Plan

- 5.1 The Southwark Unitary Development Plan was adopted in July 1995. The proposals map has 3 designations covering the site, and the coach and car park has an additional designation.
- 5.2 [i] Regeneration Area: The Council has defined a small number of such areas within the borough, its purpose, as defined in UDP Objective R.2 is:
to stimulate and direct private investment, in partnership with the public sector to targeted areas of Southwark, to assist the local economy, improve the environment and meet community need
This policy also seeks to bring vacant sites back in to use and encourages investment.
- 5.3 [ii] Archaeological Priority Zone: The site lies within the Bankside Archaeological Priority Zone as there is a evidence of human occupation of this area since pre-historic periods. Policy E.5.1: Sites of Archaeological Importance outlines the Council's expectations in this regard.
- 5.4 [iii] Strategic Views Protected Viewing Corridor: The site is within the Strategic Views Protected Viewing Corridor. This relates to the height of buildings and seeks to protect views of St Paul's Cathedral from Greenwich Park and Blackheath Point. Policy E.2.2 Height of Buildings gives the heights which **can should** not be exceeded. The constraints placed on the site by its proximity to the Tower Bridge will be significantly more restrictive than the Strategic Views Corridor, which only looks at absolute heights rather than design and context.
- 5.5 [iv] Proposals Schedule 13 [Housing]: The Potter's Field site is specifically designated for housing in the current Unitary Development Plan. This is dealt with in Section 6 of this brief.
- 5.6 Other relevant policies include:
- Policy E.2.1: Layout and Building Line, Policy E.2.2 Height of buildings, Policy E.2.3: Aesthetic Control, Policy E.2.5: External Space and Supplementary Planning Guidance 1 Design and Layout of Development all seek to ensure that development is appropriate within its context and displays an acceptable standard of design and quality, together with attention to the public/private spaces surrounding the buildings.
 - Objective E.7: Thames-side and Policy E.7.1: Riverside Townscape, Thames Path and Public Access to Thames Frontage and Shoreline recognise the special importance of the Thames, and the Tower of London, and encourages increased use and access to the Riverside Walkway, and exemplary standards of design.
 - Objective E.4: Conservation Areas, Policy E.4.3: Proposals Affecting Conservation Areas, Policy E.4.6: Proposals Affecting Listed Buildings and Policy E.4.7: Preservation and Restoration of Listed Buildings and Other Structures of Architectural Interest or Historic Merit seek to protect and maintain listed buildings, and protect the character of conservation areas and the settings of listed buildings and structures.
 - Policy E.3.1: Protection of Amenity ensures that development will not result in a nuisance or loss of amenity to users and occupiers of the area, or future users of the site.

- Policies C.2.7 and Policy E.1.1: Safety and Security seek to ensure safety and security both generally and specifically relating to public, community and cultural buildings and open spaces.
- Policy C.6.1: New Arts, Cultural, Entertainment and Visitor Facilities particularly encourages such facilities within the Thames-side area, close to public transport, and makes special mention of where historic buildings will be bought back into use.
- Policy C.1.3: Retention of Existing Community Facilities and Public Buildings which seeks to retain community uses unless the facility is incorporated in the new development or is to be relocated to a more appropriate building.
- Policy C.7.1: Accessibility provides for access to facilities by those with mobility difficulties and disabilities.
- Policy H.1.5: Dwelling Mix of New Housing, Policy H.1.8: Standards for New Housing, Policy H.1.10: Provision of Housing to Mobility and Wheelchair Standards and SPG: Standards, controls & guidelines for residential development all outline Council's expectations and requirements with respect to new residential development.
- Policy H.1.4: Affordable Housing Outlines the Council's requirements with respect to the provision of affordable housing.
- Policy B.2.3 Class B1 Business Proposals [Corporation of London site only] outlines the general criteria for new office development.
- Policy S.1.6: Hot Food Outlets requires that regard is had for the hygienic emission of fumes and smells.
- Policy T.1.2: Location of Devt in Relation to the Transport Network, Policy T.4.1: Measures for Cyclists and Policy T.2.1: Measures for Pedestrians provide for consideration of transportation issues.

The London Plan

- 5.7 This document forms part of the development plan for the borough. The Brief Site lies within three identified areas in the London Plan: Central London, the Central Activities Zone, and the London Bridge Opportunity Area. It also lies within the Blue Ribbon Network, and adjacent to Metropolitan Open Land.
- Policy 5B.1 sets the priorities for the large Central London sub-region.
 - Policy 5B.2 Development in the Central Activities Zone sets out the priorities for this smaller area, stating that “commercial development associated with business, tourism and retail and provision for national and international agencies, institutions and services” should be accommodated in this area, subject to protecting housing. Densities will be expected to be maximised.
 - Policy 5B.4 provides for Opportunity Areas, again requiring that densities are maximised in these areas. Reference is also made to planning obligations, and indicates that the general policy directions for each Opportunity Area are set out in the following sections.
 - Within the London Bridge Opportunity Area 24,000 new jobs and 500 new homes should be provided by 2016 [Table 5B.1]. Paragraph 5.33 gives the specific guidance for this Opportunity Area, including;

“This is a good location for a tall, landmark mixed-use development. The planning framework should draw visitors eastwards along the riverside.”

- Policy 3D.4 provides for arts and cultural facilities. Paragraph 3.241 advises that new tourism attractions should be focussed at Town Centres and Opportunity Areas with good access to public transport and at the fringe of the Central Activities Zone. It also recognises the emerging role of the South Bank.
- Policy 3A.21 requires that UDPs make provision for the demand for educational facilities, taking need, potential provision, transport and other planning policies into account. Paragraph 3.91 requires that land already in educational use should be safeguarded.
- Policies 4B.10, 4B.11 and 4B.13 give advise regarding heritage and its protection.
- Policies and guidance relating to the Blue Ribbon Network encourages sport and leisure activities, improving access to the river, biodiversity and heritage, flooding and drainage, uses on the water, design, safety and planning priorities.
- Other relevant policies and guidance relate to design, views, heritage, tourism, arts and culture, housing including affordable housing, transport and parking and managing resources.

Draft Southwark Plan and Draft Supplementary Planning Guidance

- 5.8 The Unitary Development Plan is currently under review. A second deposit draft Southwark Plan was placed on deposit in May 2004. The consultation period for the first deposit expired on July 9 2004. The Supplementary Planning Guidance were approved in draft for consultation purposes on 28th November 2002. The consultation period for these expired on 14th March 2003.
- 5.9 The proposals map has a number of designations covering the site. The entire site falls within the Thames Special Policy Area, the London Bridge Opportunity Area, Strategic Cultural Area, a Transport Development Area and the Central Activity Zone. The Potter's Field site [Proposal 3P] and the Lambeth College site [Proposal 4P] are both specifically designated in the draft Plan. In heritage terms, the site lies within the Archaeology Priority Zone, a Strategic Views - Wider Consultation Zone, and the Lambeth College site lies within the Tower Bridge Conservation Area. The adjacent Potter's Field Park which is likely to be affected by redevelopment of the Potter's Field Site is designated Metropolitan Open Land.
- 5.10 Appendix 4 sets out the requirements for the sites designated on the Proposals Map. The Potter's Field site is required to include "a large arts or cultural use of London or nation-wide importance which would act as a significant attraction in its own right". Other acceptable uses are D1, A at ground floor only, and residential providing it is subordinate to the main arts or cultural use. No other uses are allowed and further guidance is referred to in this Planning Brief. The Lambeth College site is designated for D1 with education as a priority. Other D1 uses except a place of worship or church hall are also acceptable, however no other uses are allowed.

- 5.11 Thames Special Policy Area: This designation specifically relates to Policies 3.29 and 3.31 - Development within the Thames Special Policy Area (TSPA) and Protection of riverside facilities, and Supplementary Planning Guidance (SPG) - Thames Special Policy Area. The SPG gives specific guidance about the Brief Site. Use of the Potter's Field Site "should be directed to an arts/entertainment/cultural performance or visitor use of national or international significance which addresses the river front with a distinctive frontage of the highest architectural quality. ~~"The guidance states that R~~residential use is acceptable only in order to make the above use viable, and should not exceed 25% of the floorspace, nor conflict with the principal use of the site. Three principles of world class design, establishing the site as a tourist destination and contributing to the vibrancy of the area during the day and night are identified. The protection of the community use and heritage value at Lambeth College and mixed use on the Tower Bridge frontage are also identified. The Potter's Field Planning Brief is referred to as the key guidance in relation future development/use of these sites.
- 5.12 The London Bridge Opportunity Area: Part 1 of the Plan, Paragraph 8.3 and SPG London Bridge Opportunity Area give guidance for this designation. This refers to the dual priorities in this area of office and tourism. It notes that "Potter's Field is the last riverside, historic, strategic site within the London Bridge area. A predominantly cultural use of exemplary design would be the most appropriate development to compliment the existing attractions in the area to complete this stretch of the riverside and provide an attraction for local people, workers and visitors" reflecting the guidance in the London Plan. The SPG reiterates the guidance of the TSPA, including specific reference to the Brief Sites; "The Council will encourage further expansion and consolidation of the tourism sector within Bankside and London Bridge leisure facilities should be prioritised next to the river where they can make a positive contribution to drawing visitors along the Thames Path, and contribute to the experience of the area". The guidance also gives advice on design, heritage and transport.
- 5.13 Central Activities Zone: This zoning establishes the site as part of central London, with commensurate densities and restrictions on parking and access by private vehicles.
- 5.14 Other relevant policies include:
- Policy 1.13 ii Arts, Culture and Tourism Uses encourages new provision, particularly within the Strategic Cultural Area, recognising the importance of these activities in stimulating investment and employment in the wider area and changing perceptions.
 - Policy 2.3 Enhancement of Educational Establishments requires these to be protected and, where possible, enhanced, except where similar or better provision is made elsewhere.
 - Policy 3.1 - Environmental Effects, Policy 3.2 - Protection of Amenity ensures development will not result in substantial loss of amenity to adjacent users, residents and occupiers (present and future).
 - Policies 3.4 to 3.9 deal with resource management, together with 3.10 which requires the efficient use of land.
 - Policies 3.15 to 3.19 seek to protect and enhance the character of conservation areas, the setting of listed buildings and structures and, Southwark's archaeological resources.
 - Policy 3.114 - Quality in Design, Policy 3.13 - Urban Design, Policy 3.14 - Safety In Design, SPG 15 – Design, SPG 16 Designing Out Crime promote high quality design in

itself and in relation to the wider context of the surrounding environment, and using design as a means to improve safety and the security.

- Policy 3.20 - Tall Buildings, advises where buildings of over 30 metres in height may be appropriate and gives guidance for the assessment of any application for a tall building in relation to design and context.
- Policies 3.21 and 3.22 give advice on strategic and local views.
- Policy 4.1 - Housing Density, Policy 4.2 - Quality of Residential Accommodation, Policy 4.3 - Mix of Dwellings, Policy 4.4 - Affordable Housing, Policy 4.6 - Wheelchair affordable housing, Appendix 15 Affordable Housing are all material considerations for any residential uses.
- Policy 5.3 - Walking and Cycling, Policy 5.2 Transport Impacts, Policy 5.5 Transport Development Areas, Policy 5.6, 5.7 and 5.8 parking policies require developments to maximize the potential of sites commensurate with local access to public transport nodes, to curb reliance on private vehicles and to encourage more sustainable forms of transport including public transport, cycling and walking as appropriate.
- Policy 2.5 - Planning Agreements, Policy 1.1 - Access To Employment Opportunities, Appendix 7 and individual policies give guidance as to when and what type of planning obligations would be sought.
- Policy 3.13 - Sustainability Appraisal, Policy 3.17 - Design Statements, Policy 5.1 - Traffic Assessment give guidance on the information which should accompany an application.

Other Internal Guidance

- 5.15 The draft London Bridge Planning Framework was adopted for consultation in October 2002. This recognises that the development of the three Brief Sites is critical to the success of the area. It notes that a sensitively designed development will contribute to the approach to Tower Bridge and form a fitting backdrop to the Tower of London. It also advises that this gives the opportunity to extend the park and improve its boundary definitions.
- 5.16 Conservation Area Appraisals have been adopted for the Tower Bridge and Tooley Street conservation areas. These should guide the design of developments.

Planning Policy Guidance

- 5.17 PPG1, General Policies and Principles outlines the principal objectives of re-using previously developed land in an efficient way, locating traffic-generating uses on sites with good access to public transport and attention to design particularly in areas which are recognised for their particular townscape value or historic interest.
- 5.18 PPG 3 Housing provides for higher density housing development where good design is evident and establishes the provision of affordable housing as a material consideration.
- 5.19 PPG 15 Planning and the Historic Environment This guidance is concerned with protecting and enhancing listed buildings and their settings, and the special character of conservation areas. It recognises the special importance of World Heritage sites and notes that protection and maintenance of listed buildings is best secured by active

use of the building. It also notes that new development in the vicinity of listed buildings must respect them in order to preserve their historic integrity.

- 5.20 PPG 16 Archaeology and Planning notes that archaeological remains are a finite non-renewable resource which must be protected both for the sense of national identity they engender, and for their role in education, leisure and tourism.
- 5.21 PPG 21 Tourism recognises the importance of tourism to local areas and nationally, but warns against adverse environmental effects which often accompany large-scale tourist activity.

LAND-USE POTENTIAL

- 6.1 This section outlines the types of uses the Council will be seeking and will consider for each of the sites. It deals with each of these sites in turn.

Potter's Field Site

- 6.2 The Potter's Field Site has a unique status as a major development opportunity in London, the importance of which can not be over-stated. It lies immediately south of London's second-most visited paying tourist attraction, the Tower of London, and is reached by crossing London's most famous bridge. To the west, between London Bridge and Waterloo, a major tourist area has recently developed following the opening of the Tate Modern and the Globe Theatre. This has led to the transformation of the South Bank. ~~Although the area around the brief site has recently become busier and more attractive to visitors, particularly with the occupation of City Hall, and the completion and opening up of much of the More London site. However, there is significant potential and capacity to build on this and achieve the guidance in the London Plan to draw visitors further eastwards, however many visitors to this area do not currently venture further east than London Bridge. There are other smaller visitor destinations closer to Potter's Field, however these are too small and spread out to define the area as a tourist destination. Further, riverfront development east of London Bridge has a corporate character, the Riverside Walkway is more enclosed and somewhat overwhelmed, and there is a lack of interest at ground level.~~
- 6.3 The Potter's Field site offers the unique opportunity for a large arts or cultural use of London or nation-wide importance. The development would act as an anchor, establishing this stretch of the river as a destination in its own right. It would connect the tourist areas to the west and north, and compliment and feed into smaller visitor attractions which already exist in the area such as the London Dungeons, Britain at War Museum, and the Design Museum to name a few. The principal use of this site should change perceptions of the area, similar to the success of the Tate Modern, which can be best achieved by establishing an arts or cultural development with substantial interest and draw. In this way, real regeneration benefits can be achieved, significantly contributing to the vibrancy of the area, with knock-on effects for the prosperity of the borough.
- 6.4 Any development of the Potter's Field site should include a significant arts and/or cultural element. Such uses might include an art gallery, museum, theatre or themed attraction. The scale and draw such use(s) is key to considering any planning application, and any use which falls within the D1 or D2 use classes will not necessarily be acceptable where it can not be shown that it would act as a significant attraction in its own right.

Furthermore, justice can only be done to this “trophy” site by building(s) of exemplary design, and preferably statement architecture.

- 6.5 Evening and night-time uses will be encouraged to give life to the area when the offices of the More London development are closed. However, the development will also be expected to maintain an active frontage during the day, engaging the many visitors to Potter’s Field Park.
- 6.6 Retail [A1 Use Class] or Restaurants and Cafés [A3 Use Class] will be considered, but should compliment the envisaged principal arts/cultural use.
- 6.7 Residential uses are likely to be acceptable as part of a mixed use development but should not compromise the arts/cultural use or detract from the perception of the site as a visitor attraction. The development as a whole should not have a predominately residential character. Any residential uses on the site will need to accord with the London Plan, as it relates to affordable housing, and as expressed in the most recent draft Supplementary Planning Guidance: Affordable Housing and 2nd deposit Plan. The affordable housing provision will be expected to be provided on-site, and be 40% of the gross increase in residential content, with at least 70% as social rented housing. If at all possible, units of three or more bedrooms with private outdoor amenity area should be included in the affordable housing provision. Exceptions will be made where it can be demonstrated that this can not be achieved together with the arts/cultural use in terms of financial viability.
- 6.8 Limited car parking provision would be required on this site. Servicing, the picking-up and dropping-off of visitors including those in coaches and disability access must be provided for. Car parking provision for any residential uses will not exceed 80% carparking provision, all of which must be accommodated below ground floor level. Coach parking serving the arts/cultural use and adjacent park may also be provided below ground floor level providing this does not conflict with other traffic movement. Provision should also be made to encourage and facilitate other forms of transport, such as walking, cycling and public transport, and if there is residential use on the site, provision should also be made for electric vehicles, convenient deliveries and scooter pools and/or car club.

Lambeth College Site

- 6.9 This site is currently in Class D1 Community Use and this shall be retained. This might take the form of an educational use, a library or some form of arts or cultural use that would take advantage of the large spaces within the listed building. It is anticipated that the vacant land on the corner of Queen Elizabeth and Tower Bridge Road will be developed, and this should also be for community use, with priority given to educational use as there is a demonstrated need for this in the Council’s Schools Organisation Plan. If developed for arts or cultural purposes, the new build should have an active street frontage. Uses would be expected to demonstrate active engagement with the community through at least some of their regular activities.
- 6.10 The listed building is considered unsuitable for residential use. This would compromise the character and integrity of the listed building. A residential development on the

corner would also be likely to limit the space available for, and inhibit the desired community use of the listed building, particularly as a school.

- 6.11 The site can not readily accommodate a car parking area and it is not considered necessary in this location given the access to public transport. However, servicing and disabled access will need to be addressed. It is anticipated that much of this can be achieved through an agreement with the developer's of the Potter's Field site. This should allow the use of the listed building by a wider range of occupiers, including those who have significant delivery and servicing requirements. This matter is discussed further in 7.3.3 below.

The Corporation of London site

- 6.12 A mixed use development ~~comprising at least 30% office floorspace~~ is most appropriate for this site, ~~given its designation in the Preferred Office Location in the draft Southwark Plan. This could include office use. Complimentary uses could include~~ retail or residential above ground floor level. Community/Arts/Cultural uses will be considered on their individual merits, however it is noted that the frontage of the site is tightly constrained by Tower Approach and as such a use which generates large numbers of people may not be appropriate.
- 6.13 There are constraints to residential uses such as a lack of daylight and sunlight to the lower floors at the rear, significant noise and pollution generated by traffic on Tower Bridge Approach, and no set back from the pavement. However, if these factors are addressed the residential use could be subject to affordable housing provision of 40% of the gross increase in residential content in accordance with the London Plan, as expressed in the most recent draft Supplementary Planning Guidance: Affordable Housing and 2nd deposit Plan. The affordable housing provision will be provided on site.
- 6.14 It is noted that the site is an operational yard required by the Corporation of London for servicing Tower Bridge and is not necessarily going to be redeveloped in the immediate future. The site has been included as part of the planning brief as there is a preference for it to be redeveloped in conjunction with the remainder of the Brief Site, and because of the close relationship between the three sites.

DESIGN CRITERIA

Design Quality

- 7.1 An architecturally led development, of outstanding, world class quality will be encouraged on this prominent site. The aim will be to realise quality design innovation, in terms of its form, detailing and materials, which sets new standards in public/tourism related buildings yet successfully reconciles the complexities of the site, including its relationship with the Thames, adjacent listed buildings and conservation areas. Schemes that gain consent will be expected to retain the same high standards of design, from the detailing stage through to the completion of the project.

7.2 The building(s) on the Potter's Field site is required to stand out visually and architecturally in order to contribute to the rebranding of the site as a tourist attraction. Any uses on the site which are not directly related to the arts/cultural use are expected to be subservient in order to achieve this. The same high standards of design quality and architectural merit will apply.

Scale, Height & Massing

- 7.3 The size of the buildings on the site should respect the scale of the buildings in the surrounding area and the setting of adjacent listed buildings and the character of the conservation areas. The site is also within the strategic backdrop viewing corridor and has long views from a number of important sites including those identified in the London Plan and in relation to the World Heritage Site. The height of buildings forming the boundary with Tower Bridge Road and Queen Elizabeth Street will be defined by the relationship with Bridgemaster's House and consideration of the Lambeth College Building and the listed bank on the opposite side of Queen Elizabeth Street. There is some scope for articulating the corner of Queen Elizabeth Street and Tower Bridge Road by a modest increase in height focused on the corner.
- 7.4 The combined effect of the massing, volume and shape of the buildings or group of buildings will need to respect other buildings in the area, including City Hall, be appropriate for the site in terms of its immediate context, and longer views, and enhance the character of the conservation areas. It is expected that the development of the sites along Tower Bridge Approach will establish a strong building line along the street frontage, framing views of the bridge.
- 7.5 Building up the western side of Tower Bridge approach would frame views of Tower Bridge from the south and provide a balance for the existing buildings on the opposite side of the road. It would also provide a context for the listed Bridgemaster's House, which is currently isolated and awkward. Active use of the listed building on the Lambeth College site will allow for its protection and maintenance.

Layout and External Spaces

- 7.6 A creative framework of routes and spaces will be encouraged that connects the site locally and more widely with such areas as the Tate Modern, London Bridge, Shad Thames and Bermondsey. The principal active frontage of development on the Potter's Field site will engage with and contribute to the enjoyment of the Potter's Field Park. The development should respect the historic urban grain of the area by connecting the site with Tooley Street and the River Thames.
- 7.7 **THE EXISTING BOUNDARY BETWEEN POTTER'S FIELD PARK AND THE COACH PARK IS IRREGULAR AND AWKWARD. AS SUCH, IT DOES NOT CONTRIBUTE TO THE PARK ITSELF AND MAY COMPROMISE THE EFFICIENT DEVELOPMENT OF THE SITE. IT IS NOTED THAT THE PERMISSION FOR AN OPERA HOUSE ON THE COACH PARK SITE, GRANTED IN 1994, INCLUDED A REALIGNMENT OF THIS BOUNDARY. THIS ALLOWED FOR THE EFFICIENT USE OF THE DEVELOPMENT SITE WITHOUT COMPROMISING THE PARK ITSELF. IT IS CONSIDERED THAT AMENDMENTS TO THE BOUNDARY ARE ACCEPTABLE SUBJECT TO ;**
- (I) THERE BEING NO NET LOSS OF AREA TO POTTER'S FIELD PARK ITSELF AND PREFERABLY IN INCREASE IN THE TOTAL AREA OF PUBLIC OPEN SPACE;**

(II) THERE IS NO LOSS IN THE QUALITY OF THE PARK, INCLUDING CONSIDERATION OF VIEWS TO TOWER BRIDGE AND THE TOWER OF LONDON

(II) ANY READJUSTMENT OF THE BOUNDARIES WILL SERVE TO IMPROVE THE AMENITY AND USEABILITY OF SPACES WITHIN THE PARK, AND IMPROVE ACCESS AND PERMEABILITY.

ANY AMENDMENTS TO THE BOUNDARY OF THESE SITE WILL ALSO BE IN ACCORDANCE WITH THE DRAFT BRIEF FOR POTTER'S FIELD PARK, PREPARED BY THE CROSS-RIVER PROJECTS TEAM, WHICH FORMS THE BASIS FOR TENDERS FOR SIGNIFICANT IMPROVEMENTS TO THE PARK FUNDED FROM SECTION 106 MONIES FROM THE MORE LONDON DEVELOPMENT.

- 7.8 All servicing for the Potter's Field site will be accessed from Potter's Field Lane. It is expected that the servicing and manoeuvring areas will be shared with the listed building on the Lambeth College site. Servicing arrangements should also be provided to the rear of the Corporation of London site, which is currently seriously restricted in redevelopment terms as it relies on the single ramped access off Tower Bridge Road. Such arrangements will allow for the efficient use of the entire Brief Site and allows for the reuse, and therefore protection and preservation of this listed building.
- 7.9 Care will need to be taken when developing the Potter's Field site to ensure that it does not compromise the future development of the Corporation of London site. Although this site is narrow, it would not be possible to develop it as single aspect fronting only on to Tower Bridge Road, and it is expected that any building(s) on this site will be as deep as the Bridgemaster's House.
- 7.10 Landscape - The shape, form, colours and elements of the landscaping treatment and the manner in which these components combine shall compliment and enhance that used in the More London/GLA development. Lighting will also be expected to comply with the *Pool of London Lighting Strategy April 1997*.
- 7.11 Public Art - The integration of public art into the development at the design stage will be encouraged. The developer and the architect should work with artists and craftsmen at the outset which are integrated with the design of the buildings and landscaping.
- 7.12 Local Agenda 21 - The developer will be required to show clearly how they have met the Council's requirements to create a sustainable form of development. This will require a full sustainability appraisal as part of the Environmental Impact Assessment. Any residential development must be built to EcoHomes standard of at least 'very good', and should be to a 'excellent' standard.

THE STATUS AND OUTCOMES OF THE PLANNING BRIEF

- 8.1 This Planning Brief has been prepared by Southwark Council's Planning (Development Control) Section in response to recent interest expressed by the landowners and other interested parties in these sites. ~~It is expected that t~~he aspirations and objectives of this Planning Brief will ~~underpin any forthcoming development proposals and the brief is~~

be a key material consideration in assessing any development proposals. It will also give a clear framework of the Council's expectations to potential occupiers of the Lambeth College site and potential developers of the smaller Corporation of London site together with other policy documents.

- 8.2 The site is unsuitable for outline planning permission applications due to its heritage context, therefore only full planning applications should be submitted.
- 8.3 An Environmental Impact Assessment will be required to be submitted with any application for the Potter's Field site, but will not be required for any application which only includes the Lambeth College site or the Corporation of London site. However, development of these sites will require a full design statement, sustainability impact report and a traffic impact statement.

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A copy of the Unitary Development Plan and up to date Supplementary Planning Guidance can be viewed on our website, www.southwark.gov.uk, under the heading “future southwark”.

Information regarding the BREEAM appraisal can be found on the British Research Establishment website, www.products.bre.co.uk/breem. *NB This is not a website of London Borough of Southwark and no responsibility is taken for its content.*

Appendix 2 Consultation responses to consultation of the 27th August in full with officer comments

«Name»		Planning Policy
«A1»		Direct Line 020 7525 5475
«A2»		Facsimile 020 7525 5561
«A3»		Contact Lisa O'Donnell
«A4»		Our ref Potter's Field
Attention: «Attn»	Dear	Planning Brief
«Salutation»	Date	August 2004
		27 August 2004

RE: DRAFT POTTER'S FIELD PLANNING BRIEF

As you are aware, the council published a draft planning brief in March 2002 for three sites, Potter's Field former coach park, Lambeth College, and the servicing yard for Tower Bridge owned by the Corporation of London. The council received your comments on this draft document, or understand you are interested in the site by your attendance at the recent Public Inquiry for proposed development on the site.

The planning brief has now been revised, partly in light of these comments, and to bring it up to date. The council is now consulting on this revised draft.

Two copies of the revised planning brief have been prepared. The first shows the changes since the document you were consulted on in 2002. It also shows the changes made to the document that went to committee for adoption in March 2004. The March 2004 version of the planning brief has been withdrawn by the Council and the Council is now consulting on a revised version of the brief before it is considered by the Planning Committee. The second document does not show any changes, and is the proposed text for the planning brief.

These documents may be viewed at the council offices, Chiltern, Portland Street, London SE17 2ES. If you require an officer to discuss the planning brief with, please telephone 020 7525 5475 to make an appointment with Lisa O'Donnell. The documents are also available under "planning policy publications" on the council's website www.southwark.gov.uk/udp. Finally, a copy of the documents can be sent to you free of charge, on request. Please telephone Lisa O'Donnell on 020 7525 5475 to arrange for a copy of the document(s).

Please ensure any response you wish to make is received by the council by 21 September 2004 (21 days, excluding the August Bank Holiday weekend) to ensure that it is taken into account.

If you require any further information or assistance, please contact Lisa O'Donnell on 020 7525 5475.

Yours sincerely

Lisa O'Donnell
Principal Planning Policy Officer
lisa.odonnell@southwark.gov.uk
www.southwark.gov.uk/udp

Name	A1	A2	A3	A4	Attn	Salutation
Historic Royal Palaces	Hampton Court Palace	Surrey	KT8 9AU		John Barnes	Mr Barnes
Southwark Heritage Association	216 Upland Road	London SE22 0DJ			David Alden	Mr Alden
Pool of London Partnership	3 Gainsford Street	London SE1 2NE			Linda Houston	Ms Houston
Barton Wilmore Planning	6 th Floor, Venture House	27-29 Glasshouse Street	London W1B 5BW		Chris Brett	Mr Brett
St Martins Property	Shackelton House	4 Battlebridge Lane	London Bridge City	London SE1 2HX	S P Card	Sir/Madam
The Photographers' Gallery	5 Great Newport Street	London WC2H 7HY			Paul Wombell	Mr Wombell
Transport for London	Windsor House	42-50 Victoria Street	London SW1H 0TL		Mike Smith	Mr Smith
Corporation of London	PO Box 270	Guildhall	London EC2P 2EJ		J Matuszewski	Mr Matuszewski
Greater London Authority	City Hall	Queens Walk	London SE1 2AA		Giles Dolphin	Mr Dolphin
Innovision Media	76 Littlebury Road	London SW4 6DN			Simon Elliott	Mr Elliott
Mr & Mrs Kent	16 Crane Street	Greenwich	London SE10 9NP			Mr & Mrs Kent
Confederation of Passenger Transport UK	Imperial House	15-19 Kingsway	London WC2B 6UN		Brian Hirst	Mr Hirst
Leslie Smith	14 St Olaves Estate	Druid Street	London SE1 2EX			Sir/Madam
Councillor Richard Porter	c/o Member's Room	Southwark Town Hall				Councillor Porter
Councillor Nick Stanton	c/o Member's Room	Southwark Town Hall				Councillor Stanton
Alan Chapman FCA	Tooley Street & Tower Bridge Community Assoc.	39 Lafone St	London SE1 2LX			Mr Chapman
Dr Hugo de Burgh	Chairman, Tooley	11 Queen Elizabeth	London SE1 2LP			Dr de Burgh

	Street & Tower Bridge Community Assoc.	Street,				
Mrs Gladys Tay	7 Queen Elizabeth St	London SE1 2LP				Mrs Tay
The Rt Hon Mr Simon Hughes MP	House of Commons	Westminster	London SW1A 0AA			Mr Hughes
FILE COPY						

CONSULTATION RESPONSES AND OFFICER COMMENTS

Berkeley Homes' Objection	Officers Comments
<p>As discussed in the supporting letter submitted with these representations, BH maintain all previous objections and repeats the evidence and closing submissions made at the Inquiry as relevant.</p>	<p>Consideration of a planning brief as a policy document is not the same as consideration of planning applications for a site. The planning applications and their relationship to the adoption of the brief has been addressed in the main report to committee.</p>
<p>BH very concerned about the timing of the publication because it is considered inappropriate and irrational to publish; i. prior to a decision on the outstanding planning applications for two of the sites as this will inevitably be material to the land use proposals for the site; ii. and it is premature pending the adoption of the Replacement UDP with which it must comply and which has yet to complete its statutory process; iii. and it was published during the summer holiday period which will result in a limited number of parties reviewing it and/or amount of time to respond.</p>	<p>i. There is no sound reason why a planning brief should not be adopted for a site that has outstanding applications over part of it, and no justification is given as to why this is “inappropriate and rational” in terms of policy, legislation or reason. The existence of outstanding planning applications does not disable the council from exercising its powers as a local planning authority. Further, the planning brief in various drafts was in the public domain over 10 months prior to the submission of the first of the planning applications, and over a 1½ years before the submission of the last planning applications. Since the first draft, the planning brief has included priority for an arts/cultural use of at least London-wide and preferably nation-wide importance on the coach park site and cultural/community use on the Lambeth College site, together with other fundamental principles of the current draft¹⁰.</p> <p>ii. Again, the brief does not rely on the status of the 2nd deposit plan. Although in accord with the 2nd deposit plan, the brief also accords with the London Plan which provides the most up-to-date policy and guidance against which to assess the appropriate balance of housing and arts/cultural use on the former coach park. The requirement for community use on the Lambeth College site is derived from policies in the adopted UDP and the 2nd deposit Plan.</p> <p>iii. Additional time was given to respond beyond the 21 day period to take account of the Bank holiday. No-one contacted the lead officer to request an extension to the consultation period and no comments or holding statements have been received to indicate that the time of year has compromised effective consultation.</p>
<p>If the Council wish to draw upon priorities in the London Plan to justify the brief it should explain what these are. These priorities include provision of additional housing in London as well as others considered at Public Inquiry.</p>	<p>These are set out in the body of the report to Planning Committee.</p>

¹⁰ Draft Potter's Field Planning Brief March 2002, particularly paras 6.2.2, 6.2.3 and 6.3.1

<p>On the basis that it is written in support of the Replacement UDP, it is inappropriate to imply that it will be a 'key' material consideration in determining future development. In fact, would only be a material consideration provided it was consistent with the adopted UDP and complied with para 3.15 of PPG12. For these reasons it would be premature in advance of the UDP review.</p>	<p>Reference to the word 'key' has been removed.</p>
<p>Inappropriate to require Lambeth College to remain in educational use. The buildings are vacant and therefore could only be considered as last used for educational purposes, but the educational uses relocated within the catchment area so non-educational use would be entirely compatible with adopted UDP and emerging policy as confirmed by the Council during the course of the Inquiry.</p>	<p>The brief does not require educational use on this site. It requires a D1 Use {Ref para 6.9}</p>
<p>The brief should not imply that Lambeth College will change ownership in the near future through use of the words "currently owned by Berkeley Homes".</p>	<p>The fact that the site is for sale through Kalmars and their reference to a number of offers of purchase during the Public Inquiry would indicate that Berkeley Homes do not wish to retain ownership of the site in the long term.</p>
<p>The final sentence of para 4.4 should be re-written as "The unusual design of the City Hall will also have a bearing on <u>need to be taken into account in</u> the design appropriate for the Potter's Field site".</p>	<p>No reason or justification is given for this statement.</p>
<p>Paragraph 4.8 refers to a decision by the Planning Inspectorate in respect of the Royal Opera House proposal. In particular, the Inspector is quoted to conclude that the Potter's Field site is not crucial in meeting the housing targets of the Borough and that housing should not be sought irrespective of other planning considerations. Notwithstanding the fact that this decision was reported under a different set of circumstances (ie prior to the publication of PPG3 and the London Plan, both of which prioritise the use of previously developed land for predominantly housing purposes), any mixed use development, which does not propose 100% residential use, would accord with the Inspector's comments. Accordingly, paragraph 4.8 should be deleted and rewritten to indicate that a mixed use proposal would be considered acceptable on the Potter's Field site, and subject to all the points and evidence as to the proper use dealt with at the Inquiry and</p>	<p>It is unnecessary to delete paragraph 4.8 of the brief on these grounds as a mixed use development including an element of residential use is considered acceptable on the former coach park site as set out in paragraphs 6.2 to 6.8 of the brief. However, this is subject to consideration as to how much housing there should be on the site, and the degree to which this should take priority over other uses, particularly arts/cultural uses. The Inspector is not silent on this debate and his report includes comments such as "The site required an imposing public building of significant architectural design, and preferably one contributing to the developing role of the area for tourism and public activity, thus offering economic and community benefits to this part of Southwark"¹¹, "Whilst accepting that an imaginative housing design could exploit the site's potential, I find considerable merit in the Council's argument that this high profile site next to Tower Bridge and opposite a World Heritage Site is uniquely well suited to a major public building. This is a 'trophy' site of London-wide significance and it calls for a building of</p>

¹¹ Inspector's Report, Royal Opera House Covent Garden Ltd and Greater London Enterprise Property Developments Ltd, July 1996, Paragraph 6.15

<p>referred to in our client's closing submissions.</p>	<p>special character and high architectural quality. Given the present tourism importance of the location, a building connected with arts, culture and entertainment would be particularly appropriate"¹², and "Many sites will be well-suited to housing: few sites will be well suited to a theatre"¹³. Therefore, although the theatre decision was made under different circumstances, the fact remains that this site was, and is still, uniquely well suited to a public building contributing towards tourism. This is reflected in the requirements of the brief to use this trophy site to its greatest advantage. Finally, it is noted that paragraph 4.8 is a summary of planning history as indicated by the title of this section. The decision of the Inspector is a matter of planning history for the former coach park.</p>
<p>The Planning History section of the PFPB refers to previous planning applications for the site, but does not mention the planning applications submitted by Berkeley Homes recently. The Berkeley Homes applications should therefore be referred to in the Planning History section of the Brief (as well as the outcome of the Inquiry itself).</p>	<p>These applications are not planning history as there is no decision and therefore there is nothing that can contribute to establishing lawful uses on the site or any other precedent.</p>
<p>A new Regeneration Context section should be included in the PFPB which recognises the recent changes in circumstances brought about by publication of PPG3 (March 2000) and the London Plan (ie more emphasis on housing provision).</p>	<p>PPG 3 is referenced in the Planning Policy Guidance section (paragraph 5.18), however, as set out in the main report, it is not considered that this guidance is of significant impact to the brief sites and does not warrant an additional section as housing is not a priority.</p>
<p>In paragraph 5.4 of the PFPB it is suggested that Policy E.2.2 of the Southwark UDP indicates that in Strategic Views Protected Viewing Corridors certain heights cannot be exceeded. However, Policy E.2.2 actually indicates that planning permission for development will normally be refused if it encroached a certain height, which implies that exceptional circumstances that would allow development to encroach this height. In any event this policy is to be replaced by a "view management framework" which adopts a different approach to the control of building heights. Paragraph 5.4 should be deleted and re-written so as to quote the Policy E.2.2 accurately, to refer to and reflect the correct emerging policy and to address the real question of whether any harm is caused to the strategic view by any</p>	<p>Change paragraph 5.4 to say "should not exceed" rather than "can not exceed".</p>

¹² Inspector's Report, Royal Opera House Covent Garden Ltd and Greater London Enterprise Property Developments Ltd, July 1996, Paragraph 20.14

¹³ Inspector's Report, Royal Opera House Covent Garden Ltd and Greater London Enterprise Property Developments Ltd, July 1996, Paragraph 20.17

<p>development proposal, consistent with the concessions made by the Council and English Heritage at the Inquiry as to the proper test to be apply.</p>	
<p>Paragraph 5.7 should (amongst other things) summarise the other relevant priorities for the Central London sub-region set out in Policy 5B.1 including the following:</p> <ul style="list-style-type: none"> • “Promote and protect the vital mix of culture, government, leisure and commerce together with its historic buildings, housing, open spaces and public realm... • Sustain, enhance and promote the unique scale and mix of activities...” • Identify capacity to accommodate new jobs and housing opportunities and appropriate mixed-use development”. 	<p>There are a significant number of policies which, while priorities relate to such a broad area of London that it is not necessary to detail their content. Member’s attention has been drawn to the priorities in the report.</p>
<p>The Council has not formally adopted the draft SPG on the ‘Thames Special Policy Area’. It therefore carries little weight in determining development proposals and should not be referred to in this Brief as a material consideration in determining development proposals.</p>	<p>The word “draft” has been inserted in front of the title for this section to make it clear that it is both the 2nd deposit Plan and the SPGs that are draft. It would not be appropriate to just insert ‘draft’ in front of the TSPA SPG references, as all of the other SPG referred to in this section are only draft.</p>
<p>The PFPB should not simply state that no more than 25% of the net floorspace of any proposed development should be provided for residential purposes. This is an onerous and inappropriate requirement that will affect the viability of any realistic development proposal, and would prevent creative solutions that meet a number of objectives and would be in clear conflict with other policy (local, national and regional) for the reasons dealt with in our client’s evidence and closing submissions at the Inquiry. Paragraph 5.11 should therefore be deleted and rewritten to explain: “an appropriate balance of uses which will meet the preferences for the site will be considered”.</p>	<p>This section is outlining the guidance in the SPG. The brief does not restrict any residential element to a specified proportion. The words “The guidance states that” have been inserted to clarify that this is guidance from the draft SPG.</p>
<p>Under the heading of ‘Other Relevant Policies’, paragraph 5.14 of the PFPB should refer to the Council’s housing policies contained in the adopted UDP.</p>	<p>Housing policies are referred to in paragraph 5.6 (9th and 10th bullet) and paragraph 5.14 (9th bullet).</p>
<p>The perceptions of the Potter’s Field site as an arts and cultural area can be achieved by ensuring that this type of use is accommodated at ground floor level. So long as this can be achieved, an arts and cultural use does not necessarily need to be the principal use (in terms of quantum) on the Potter’s Field site. Paragraph 6.3 should be deleted and rewritten accordingly</p>	<p>Paragraph 6.3 only states that “the principal use of the site should change perceptions of the area, similar to the success of the Tate Modern, which can be best achieved by establishing an arts or cultural development with substantial interest and draw.” There is no mention of “quantum” or any other wording that indicates that this is purely a matter of floorspace. The development “should include a significant arts and/or cultural element.”</p>

<p>to indicate that (amongst other solutions) arts and cultural uses may be able to be accommodated at ground floor level as part of any development for the Potter's Field site and do not need to be the principal use.</p>	<p>It also states that "The scale and draw such use(s) is key to considering any planning application" The use of simple ground floor units as suggested would not achieve this, most importantly it would fail to give priority to the accommodation needs of any significant arts/cultural use of London- or nation-wide importance, and would fail to ensure that the site is read as a tourist destination expressed through its architecture.</p>
<p>Support is given to the part of paragraph 6.7 which states that residential uses are likely to be acceptable as part of a mixed use development. However, an objection is made in respect of the suggestion that any development should not have a predominantly residential character. Instead, the PFPB should require any development proposal to be of a high quality of design appropriate to all uses.</p>	<p>As for above.</p>
<p>The Potter's Field site is unsuitable for an educational proposal of the type envisaged by the Council. The policies of the London Borough of Southwark as set out in the SOP support the view that additional provision should be local to the actual demand. That is, local to Canada Water, local to Elephant and Castle and local to the areas of high birth rate, largest household formation, and the migratory population. Potter's Field is acknowledged as an uneconomic potential school site. A four form (albeit two school) contiguous primary school is agreed by all to be unusual and will be contrary to all current expectations and standards. Any educational proposal of this nature for this site is demonstrably unsuitable. Again, we refer the Council to the evidence and closing submissions on these and other issues dealt with at inquiry. Furthermore, the site is fundamentally unsuitable for site-specific reasons. It is too proximate to the river, it lies right at the edge of significant main roads, and permeability to the Park would compromise the important security associated with the schools. In light of the above, paragraphs 6.9 and 6.10 should be deleted.</p>	<p>The brief does not require a school specifically, although it allows for this. It requires that this site accommodating a D Use Class continues to provide accommodation for community facilities. The council has not seen any indications that this site is unsuitable for providing community use.</p>
<p>The Corporation of London Site is not located in a 'Preferred Office Location' in the draft Southwark Plan. The entire development strategy for this site is misconceived and should therefore be deleted and reconsidered.</p>	<p>Amendments made to this section as follows: 6.12 A mixed use development comprising at least 30% office floorspace is most appropriate for this site, given its designation in the Preferred Office Location in the draft Southwark Plan. This could include office use, Complimentary uses could include retail or residential <u>above ground floor level</u>. Community/Arts/Cultural uses will be</p>

	considered on their individual merits, however it is noted that the frontage of the site is tightly constrained by Tower Approach and as such a use which generates large numbers of people may not be appropriate.
The Council has not adopted its draft SPG on 'Affordable Housing'. It is therefore of little material weight in determining development proposals and should not be referred to in this Brief.	Additional reference has been included in the brief to reference the London Plan and the 2nd deposit Plan.
It is inappropriate to imply that the PFPB will 'underpin' in any future development. On the basis that the PFPB is written in support of Replacement UDP policies, it will only be of 'material consideration' (as opposed to a key material consideration) once the Replacement UDP is formally adopted.	Reference to "key" and "underpin" removed from brief.

St Martins' Objection	Officers Comments
Previous objections remain outstanding.	
The brief is wrong to state that it will be a key material consideration in any future development on the sites.	Reference to "key" removed from brief.
References to the 1982 legal agreement and the covenants they include should be included in the brief as they are highly relevant to the deliverability of what the brief proposes. The brief should be rewritten to recognise the influence that they may have on development of this site.	These matters are relevant to whether or not the brief should be adopted and therefore have been addressed in the committee report for the brief. However, should Member's determine that the brief is deliverable in full knowledge of the legal agreement and covenants, and proceed to adopt it, then the existence of the legal agreements is no longer relevant in terms of the brief itself. They are not matters that are appropriate to include in a planning brief, in the same way that other legal agreements such as rights of way are not appropriate to be included in a planning document. They apply (or are negated/satisfied) outside of the planning process. However, they are relevant to the adoption of the brief and have been included in the committee report for this reason.
The brief should include references to; <ul style="list-style-type: none"> i. the increased need for housing, ii. the planning applications by Berkeley Homes subject to the recent Public Inquiry, iii. The attitude of the Mayor to the applications, iv. The significance of the Mayor's approach as to whether there is any conflict between the London Plan and the UDP. 	These matters are all addressed in the committee report. It is noted that the planning applications are not planning history as they are not determined. The mayor's comments on the brief are set out in Appendix 3 to this report.
It is inappropriate to regard the Secretary of State's decision on the Royal Opera House as providing any general guidance. (From previous comments) The theatre	It is noted that paragraph 4.8 is a summary of planning history as indicated by the title of this section. The decision of the Inspector is a matter of planning history for the former coach park.

<p>was a 'one-off and the decision to approve was on that basis, in particular;</p> <p>i. the Inspector did not suggest that the site was unsuitable for housing or that the designation was wrong in principle,</p> <p>ii. the occupation of the theatre was to be temporary. The permission restricted the use to a theatre and therefore is not an endorsement of any cultural use. Additionally, this permission was not implemented and no other cultural use (although some have been proposed) have been achievable on the site.</p>	<p>The brief similarly does not suggest that the site is unsuitable for housing, in fact it specifically allows for an element of residential as set out in paragraphs 6.7 of the brief. However, this is subject to consideration as to how much housing there should be on the site, and the degree to which this should take priority over other uses, particularly arts/cultural uses. The Inspector is not silent on this debate and his report includes comments such as "The site required an imposing public building of significant architectural design, and preferably one contributing to the developing role of the area for tourism and public activity, thus offering economic and community benefits to this part of Southwark"¹⁴, "Whilst accepting that an imaginative housing design could exploit the site's potential, I find considerable merit in the Council's argument that this high profile site next to Tower Bridge and opposite a World Heritage Site is uniquely well suited to a major public building. This is a 'trophy site of London-wide significance and it calls for a building of special character and high architectural quality. Given the present tourism importance of the location, a building connected with arts, culture and entertainment would be particularly appropriate"¹⁵, and "Many sites will be well-suited to housing: few sites will be well suited to a theatre"¹⁶. Therefore, although the theatre decision was made under different circumstances, the fact remains that this site was, and is still, uniquely well suited to a public building contributing towards tourism. This is reflected in the requirements of the brief to use this trophy site to its greatest advantage. Deliverability issues are addressed in the report to committee.</p>
<p>The categorisation of Tower Bridge, HMS Belfast and the London Dungeon as 'smaller' than the Tate and the Globe and 'too small' and 'spread out' is wrong and misleading.</p>	<p>Section deleted.</p>
<p>Reliance on Policy 4.4 is misplaced as there are objections to this.</p>	<p>Additional reference has been included in the brief to reference the London Plan and the 2nd deposit Plan. If concerns remain outstanding, developers can provide an open book assessment in accordance with the London Plan, which indicates that this site should provide in excess of 50% affordable housing¹⁷ To date the council has not</p>

¹⁴ Inspector's Report, Royal Opera House Covent Garden Ltd and Greater London Enterprise Property Developments Ltd, July 1996, Paragraph 6.15

¹⁵ Inspector's Report, Royal Opera House Covent Garden Ltd and Greater London Enterprise Property Developments Ltd, July 1996, Paragraph 20.14

¹⁶ Inspector's Report, Royal Opera House Covent Garden Ltd and Greater London Enterprise Property Developments Ltd, July 1996, Paragraph 20.17

¹⁷ The London Plan, paragraph 3.42

	seen any evidence to suggest that the affordable housing reference in the brief at 40% is unreasonable, or even that a level exceeding 50% is unreasonable.
The aspirations of the brief are not achievable in the short and long term. Over two years are unaware of any evidence to the contrary. Have prospect that adoption of the brief may lead to the site remaining undeveloped for the foreseeable future.	Delivery matters are addressed in the committee report.

Pool of London Partnership Response	Officers Comments
Support the main principles and welcomes intention to attract a large arts/cultural use. Also support acknowledgement of residential providing it does not compromise or detract from the arts/cultural use.	Noted
Concerned that the requirement for 40% affordable housing will deter investors wanting to provide flagship arts/cultural centre as part of mixed use.	New text included " <u>Exceptions will be made where it can be demonstrated that this can not be achieved together with the arts/cultural use in terms of financial viability.</u> "
Concerned that a limited underground coach park is not provided for to serve any new arts/culture and meeting existing needs, including drop-off for park. As the occupiers are not currently known it would be appropriate to make some provision for off-site coach parking.	New text included " <u>Coach parking serving the arts/cultural use and adjacent park may also be provided below ground floor level providing this does not conflict with other traffic movement.</u> "
Paragraph 6.2 includes comments which seem inaccurate and extremely generalised and do not reflect actual situation as observed and experienced by Partners, come of whom have provided significant investment and improvements including the riverside walkway.	New text included " <u>Although the area around the brief site has recently become busier and more attractive to visitors, particularly with the occupation of City Hall, and the completion and opening up of much of the More London site. However, there is significant potential and capacity to build on this and achieve the guidance in the London Plan to draw visitors further eastwards.</u> "
Dispute that many visitors do not venture further east than London Bridge as statistics indicate otherwise (6 million p.a). The point is that this area has the potential to attract even more visitors.	As above
The old PLP address is shown in contacts.	Address amended
The PLP will continue to work with the council to identify potential investors in the former coach park and will alert the council to organisations and potential tenants.	Noted and welcomed.

Historic Royal Palaces Response	Officers Comments
Support intention of brief.	Noted
London Plan policies relating to heritage should be referred to.	References included.

