

Dear

We welcome your approach to consultation on the new London plan and your inclusion of many of our responses in 'A new plan for London'. We also welcome the more strategic nature of the London plan covering London-wide issues rather than those that would be more appropriately made at the borough level. Although we agree with most of your proposals there are some issues that we consider require further thinking through. We provide further detail and responses to your questions below:

Chapter 2 London's places

To make the Plan more usable would it be better only for the general principles guiding development in Opportunity and Intensification areas to be set out in the body of the text together with a development capacity table, and more detailed guidance for individual areas to be set out in an Annex of the plan.

Yes. It would be better for general principles to be set out with the table. Detail about cross boundary and strategic issues could be covered within the annex. We particularly support planning for the sensitive relationship between different land uses in the Central Activities Zone.

We would suggest that the detailed guidance that is not required as a strategic London overview should be set out in core strategies, area action plans and supplementary planning documents. We consider joint working on these documents particularly important as we prepare our core strategy and supplementary planning document framework for London Bridge, Borough and Bankside opportunity area and for any revisions required to the supplementary planning for Elephant and Castle.

We also support the approach to understanding and planning for inner London and the area immediately around the Central Activities Zone. We suggest that there is clear guidance that is linked for the inner London and regeneration areas. This is because in Southwark they will predominantly cover the same areas. Also most of our regeneration areas are covered by action or opportunity area guidance or supplementary planning documents. Therefore if there is to be another layer of guidance for inner London/regeneration areas this needs to be strategic where being part of London provides additionality. In Southwark this will need to address the areas that have concentrations of deprivation and worklessness with no planned development or opportunities for large scale redevelopment. We need further clarity on how the new London plan approach to open up employment opportunities, especially to disadvantaged communities and strengthening neighbourhoods will work with the approach to regeneration areas. Therefore we would suggest that these could be a single framework for taking forward regeneration in areas where there will be little development as the areas within the inner London zone are so varied. Or this could be addressed through additional employment policies.

The Mayor is currently carrying out informal consultation with boroughs on proposed revisions to the Town Centres Network and Strategic Industrial Locations. Are there any further refinements you think should be made to these, or to any of the other elements of London's strategic spatial structure?

We support the approach particularly the protection of town centres, the upgrading of Canada Water to a major town centre and strengthening protection of industrial space. We would support specifying the town centre hierarchy in the London plan. We would encourage more rigorous, managed approach to future release of surplus industrial capacity. We would welcome working with the Mayor to determine whether our identified surplus capacity should be allocated in our core strategy. There needs to be consideration of improvements to infrastructure in industrial locations as the protection of places for employment and industry does not encourage development, section 106 and other investment. This can result in environments which are not attractive to encourage successful businesses to locate in these areas.

Chapter 3 London's people

Are there further ways in which the longer term London Plan can usefully complement the shorter term Housing Strategy?

We support moving from a blanket percentage to a numerical target for affordable housing. Although maximising affordable housing provision is a strategy that we support, we consider that this is not appropriate in all localities if the national, London and Southwark strategy to create mixed and balanced communities is to be achieved. Our annual monitoring report demonstrates that developers will provide the minimum affordable housing possible in areas of low affordable housing and the maximum in areas of high affordable housing. This reinforces single tenure communities and is due mainly to land values. Therefore we are proposing minimum private housing policies in areas of high affordable housing provision in addition to minimum affordable housing policies in the remainder of Southwark. We consider this to be a more balanced approach to ensuring that we are providing homes for a wide range of people and families on a wide range of incomes. We will also be providing higher levels of affordable housing on our own schemes and we are setting out numbers and percentages for all of our strategic sites to ensure that we are providing as much affordable and family housing as possible.

We support the emphasis of particular focus to stimulate the development of more intermediate options and family sized housing. The introduction of policy and programmes to enable the provision of affordable housing other than social housing for key workers, lower and middle income families is a key factor for successful regeneration, not least because it provides opportunities both for current social housing residents to move into shared ownership and for new residents on lower and middle incomes to move into an area, creating more economically mixed communities.

In the current uncertain economic climate, there is a particular issue developing in London in that it is becoming difficult to sell shared ownership

housing products (largely due to the lack of available mortgage finance). This uncertainty can then make schemes economically unviable to developers who are increasingly coming back to the Council with requests to change the proportion of affordable housing in their schemes and to provide intermediate rented rather than shared ownership products. We would like to work with the Mayor to find practical schemes to enable delivery of homes for people on lower and middle incomes. This is the priority for tackling the housing problems in Southwark to provide affordable homes and sustainable places. We would particularly welcome discussions on how the 60/40 policy would work in practice as our experience is that this is not viable at present as set out above.

The policy response to *give strong policy support for more affordable family-sized homes* is welcome. However, it is very difficult to deliver larger intermediate homes which are affordable to families on average incomes and ways of addressing this need to be considered. Our core strategy considers options of requiring up to 30% of housing (in major applications) to be for families with 3 or more bedrooms. We would welcome consideration by the Mayor of a similar approach for London and of ways to find schemes to make these affordable.

We welcome the more place based approach to density. However we would like changes to the broad London Plan map of density areas in Southwark to reflect the proposals in our core strategy. This needs to show areas where there are 'suburban' characteristics as even in a central London borough like Southwark can be an issue of significant concern, as is the case in areas like East Dulwich and Rotherhithe. We would welcome the opportunity to discuss changes to designations through our core strategy process.

We welcome the strategic guidance and targets for the provision of pitches for Gypsies and travellers in London. We currently provide 38 pitches on 4 sites which is 5% of the London provision. We consider this to meet our targets for provision and we urgently require discussions with the Mayor to ensure that our core strategy provides all of the requirements necessary for Gypsies and travellers as part of our contribution to the London need.

We would urge the Mayor to ensure adequate space standards for housing in all tenures as this is a key quality of life issue. We also consider that the sizes for students and hotels should be included.

*Is there an area of social infrastructure not covered here that needs to be?
Is the proposed approach to social infrastructure right? Is there a better approach?*

The little detail on a London wide approach is generally welcomed as social infrastructure is a local issue which is most effectively addressed locally. However there are a couple of issues where a London strategy would be useful.

Although places of worship are discussed as part of social infrastructure they have particular issues around the size of the space required, amenity and trip generation by cars that need to be taken into account. A London approach to provision of places of worship would be useful.

A more detailed review of how to tackle youth unemployment and crime with a focus on how provision of social infrastructure can be used to assist with a programme would be useful.

Chapter 4 London's economy

We would welcome the suggestion for a clear spatial context for the work of the London Development Agency and the London Skills and Employment Board in ensuring Londoners have the skills needed by their city's enterprises. We would like to continue to work with these organisations to ensure that Southwark's residents benefit from a strategic London approach.

We particularly support innovation, research and green technology. We would welcome the London Plan providing a strategic framework to encourage these technologies to locate within Southwark particularly in the Central Activities Zone and along the Old Kent road.

Chapter 5 London's response to climate change

Do you find existing policies related to sustainable energy in the London Plan easy to understand? Are there any areas that require clarification or improvement?

There is confusion about whether the main aim of the policy is to reduce carbon emissions or to provide more renewables. The links with the code for sustainable homes and BREEAM are also confusing, it would be more effective to have stepped targets for these. The energy toolkit requires updating to address more current issues.

We would encourage developers to reduce CO₂. We would welcome reference to district heating/CHP networks such as those in our core strategy and as planned at the Elephant and Castle and we presume that the Mayor would support these. We would also like a London wide approach to limiting cross-overs where they lead to damage of the environment and flooding. We would welcome a strategic approach to meeting the requirements of PPS25 so that a pragmatic approach to flood risk can be adopted when dealing with developments.

What do you see are the biggest challenges to the use of renewable energy in new development in London? How can the London Plan help overcome these challenges?

The policy is currently encouraging developers to introduce the cheapest rather than most effective technologies. In the long term it would be more effective to introduce more expensive technologies but these do not meet the 20%. The measuring of energy efficiency needs to take this into account. The

greatest challenge lies in setting up decentralised energy systems which are far more cost effective in terms of reducing CO2 emissions. Due to environmental constraints, onsite bio-mass heating is often the only mechanism for meeting the current policy. Southwark has concerns about the air quality impacts arising from small scale biomass heaters. We would support the opportunity for encouraging local energy networks and for these to be taken into account as a long term approach.

Should the London Plan outline a preference for onsite over offsite renewable energy in new development? Or should no preference be shown at all?

The policy should provide flexibility to allow off site provision through private-wire arrangements where the development is linked to a local energy network. It should not allow developments to meet the policy through green energy tariffs because these do not generate renewables which is the purpose of the policy rather than buy them from other places.

In situations where new developments fall short of meeting policy requirements for the use of sustainable energy do you support the use of financial contributions as an alternative? All contributions would be pooled and used to support other sustainable energy initiatives to benefit London.

Yes this is an approach which Southwark has used for the Elephant and Castle scheme where sites which are beyond the range of the MUSCo infrastructure have made a contribution towards the MUSCo. This has only been used where it has been demonstrated that developments are unable to meet the 20% targets.

Do you have any suggestions for how new development could better deal with over heating given London's changing climate?

Energy assessments need to incorporate cooling so that this is taken into account in design of the scheme from the outset.

Some towns and cities have minimum targets for urban greening, including green space, living roofs and vegetation in their central areas as a way of offsetting rising temperatures due to climate change. Would such an approach be appropriate for central London.

Southwark's sustainable design and construction SPD advises that Southwark will expect development to increase the biodiversity value of sites. This is assessed through the code for sustainable homes. Southwark would welcome a policy which provided a framework for achieving minimum targets.

What can the London plan do to better promote the uptake of living roofs and walls in new development across London.

We think there should be a policy to look at alternatives to providing these to the outside of buildings within buildings as this has positive impacts on cooling.

Waste

We welcome the review of the waste apportionment for each borough. As a lot of the evidence being gathered at the moment is based on the current sub-regional arrangements, the Waste Paper, the SHMA etc, we would be interested to know how the Mayor plans to use this evidence if the sub-regional arrangements change. It would be helpful if this could be considered. We would welcome a change in the way that the management of non municipal waste is considered. This is not an issue of the definition of waste. It is an implementation issue where the council is not responsible for the management or collection of non municipal waste and therefore can not reduce the disposal of these. This needs to be recognised and responsibility given to a London wide organisation that can effectively address change. We would not support protection of every waste site because we are taking forward a more strategic approach with a new large waste site supported by smaller sites where necessary. The approach to support all waste sites does not take into their effectiveness so they should be able to be let go for other uses where they are not needed or effective.

Chapter 6 London's transport

Given financial constraints, what else can the Mayor do to boost public transport?

We welcome the planning priority to *ensure that decisions on new development, transport infrastructure and funding are taken in a coordinated way*. However we are concerned that Southwark may fall into a gap between central and outer London. There is a lack of acknowledgement that some areas of "central London" still have relatively poor transport accessibility. Any moves to create outer London hubs without providing links to them from Peckham/E&C/Aylesbury etc will simply mean replacing one set for poor links to employment in central London with a similar poor set of links to outer London.

Transport improvements are key to the regeneration of many of our most deprived areas, such as Elephant and Castle, Peckham and Aylesbury. The decision to remove the tram from the business pan leaves us in limbo. We are very concerned that we may now have to remove this from our Local Development Framework as there is no justification for implementation. This will have a significant negative impact on these areas.

However, if the decision stands, we would welcome further information on how the transport needs of places like Walworth and Peckham will be met. Alterations to the Northern Line will impact on the North-West of the borough but will have little impact on these areas and as such we would be especially keen to know whether additional bus services will now be provided, and on what timescale. Furthermore, we would also welcome clarification as to whether Southwark will be required to safeguard sites such as the proposed tram depot in Peckham town centre, as well as other sites along the proposed route.

Is the approach to walking and cycling feasible/workable?

Yes we would support development of new cycling standards particularly for offices and community uses.

Do you support the new approach to road schemes?

We would not support more roads if they improve congestion as this may alleviate congestion in the short term however the roads will generally fill up again where additional capacity is provided so this will not provide a successful long term approach. We would consider funding to be more effectively provided to public transport projects such as at the Elephant and Castle and the tram. We consider an approach to further improve public transport to be more effective than supporting new road schemes.

Chapter 7 London's quality of life

The Mayor has accepted that the City, Canary Wharf, Croydon and other locations can provide areas and local context where tall buildings are appropriate. Currently the London Plan identifies a number of criteria to be used in assessing tall buildings proposals – whether they are landmarks enhancing London's character, in a coherent location for economic clusters and a catalyst for regeneration, as well as impacts on surroundings. Are there specific contextual factors that the London Plan could use to identify where tall buildings are appropriate? How should this be achieved? Should tall buildings outside these designated areas be restricted? Are all the opportunity areas identified in the London Plan suitable locations for tall buildings? OR should the aim be to achieve high densities without tall buildings in these areas?

We would welcome a policy change to acknowledge that tall buildings are not always welcome in all locations. Tall buildings should only be allowed in growth areas. They should only be allowed in these areas where they fit or improve the local character or areas where a new character is being created. We would welcome guidance on how a contribution to the Thames riverscape would work. In Southwark there are particular issues in Borough and Bankside as there are many conservation and historic areas that would not be suitable for tall buildings. This area has now been joined with London Bridge which is a suitable area for tall buildings. This needs to be recognised in the London Plan. We welcome the opportunity to work with the GLA on the preparation of guidance on where tall buildings would be acceptable in this location.

Should the London Plan policy protection be strengthened for local open spaces outside the strategic spaces that are designated Green Belt or Metropolitan Open Land? Or should the current position be maintained of asking Boroughs to designate locally important spaces through their LDD?

This would be better left to the boroughs as there is clear guidance on what needs to be protected as open space and there is the local decision making process for this through the Local Development Framework.

The London Plan sets benchmarks for the provision of open space through Borough Open Space Strategies. Should this position be maintained or should the London Plan seek to establish minimum standards.

This would be better left to the boroughs as there is clear guidance on what needs to be protected as open space and there is the local decision making process for this through the Local Development Framework.

The law on the reuse of burial spaces has recently changed, so is this an issue on which London Plan policy is no longer needed? Should the principle of proximity to local communities be maintained in the London Plan or can this issue be left to Boroughs to address in LDDs?

This should be left to the Boroughs.

We would also support the approach of introducing lifetime neighbourhoods. However this would need to be clearly defined so that we could successfully introduce this as a policy.

Chapter 8 Implementation, monitoring and review

How can the Mayor most effectively secure commitment from utility and other infrastructure providers to ensure adequate provision is made to meet current needs and support future growth?

We support the proposal to establish an Implementation Plan containing the strategic actions required to underpin the London plan strategy. This should include the projects where funding is required and set out how the Mayor will pay for them. These should be based on the growth areas in the London Plan and other large strategic projects. We would welcome the opportunity to work with the Mayor on preparing this guidance so that it links with local requirements.

The proposal to prioritise planning obligations to address affordable housing, public transport projects especially Crossrail, tackling climate change, learning and skills, health facilities, waste and childcare facilities causes concern. The priorities for planning obligations should be made by boroughs based on their priorities. Southwark has a detailed SPD that sets out our strategy for development with a tariff for development. Where these exist they should take priority over the London requirements.

Transport investment in the current business plan until 2017 does not seem to reflect and respond to the level of growth in Southwark within this time period. We would encourage the Mayor to support major transport improvement projects in Southwark such as the Cross River Tram and any alternatives identified, further investigation of Bakerloo line extensions and transport interchange improvements at Elephant and Castle. We would also encourage the Mayor to support investment in Southwark in the post 2017 business plan. Southwark is regenerating and increasing the population to meet London Plan targets. We should be receiving transport investment from TfL in addition to our local tariffs to enable us to improve the accessibility of areas which is so essential for successful regeneration and sustainable communities.

Working together on new planning frameworks

Although our core strategy is developing local policies that generally support the strategic approach of the new London plan. We are concerned that issues set out in our response and the final preparation of the London plan could make our new core strategy for Southwark non-conforming. This is a crucial time for our core strategy and three area action plans so we are keen to make sure that they all work together. In this respect, we hope to build on our productive discussions with Deputy Mayors Simon Milton and Ian Clements about advancing these and also the regeneration of the Elephant and Castle opportunity area.