

**27 February 2018**

**Better Bankside: New Southwark Plan Consultation**

***Introduction***

Better Bankside is the Business Improvement District (BID) for the Bankside neighbourhood. Prior to its submission to the Secretary of State, we are pleased to have this final opportunity to contribute to the strategic vision and local policy framework covering the next 15-year period up to 2033, as outlined within the emerging New Southwark Plan (NSP).

Since the previous 'Preferred Options' consultation stage, we welcome additions and amendments that include:

- Recognition of Bankside and the Borough as a “*globally significant business district*”.
- Opportunity for active frontages now indicated onto the Site Allocations' indicative plans.
- A more robust framework when permitting loss of employment space in Central Activities Zone, town centres, opportunity areas and site allocations.
- Acknowledgement that Bankside and the Borough is an area of “great archaeological interest”.
- Appreciation that the local economy is “*notable for its diversity*”, detailing the range of businesses attracted into the area.

Better Bankside have facilitated extensive consultations with local businesses and residents within the Bankside neighbourhood, not least having helped to develop the Bankside Neighbourhood Plan to its Pre-Submission Consultation Draft, in partnership with the Bankside Neighbourhood Forum. We therefore have a strong understanding of the aspirations, opportunities and challenges of the Bankside and Borough community and the rapidly developing context in which it evolves.

We believe the following recommendations, in conjunction with the existing and emerging planning and economic policies, should be included within the Submission version of the New Southwark Plan, in order for it to be found effective, justified and ultimately sound.

## **BANKSIDE AND THE BOROUGH AREA VISION / OPPORTUNITY AREAS**

AV01.01 of the Area Vision provides a high-level account of the cultural and historical contexts within Bankside and The Borough. Although this introduction mentions some of the iconic institutions within the area, we believe that the synopsis should capture the neighbourhoods' character by linking the area's heritage with its present setting. We therefore strongly suggest adding further narrative for the Area Vision for Bankside and The Borough as outlined below: *'Once London's rowdy pleasure district, Bankside has a history rooted in entertainment. Bankside has a bold and independent spirit shaped by its rebellious past.*

*Bankside is a long-standing home of essential industry, characterised by the mighty Victorian railway viaducts that run through the area and now form The Low Line. Today, amongst the ghost signs, Victorian warehousing, Hop Exchange, Power Station and modern architecture, there is a hub of talent that powers the new economy – digital tech makers, creative agencies, architects and artisan food producers.*

*Bankside is an area of exchange, connecting places and people in a central neighbourhood. Bankside is a place of connection. Five bridges join the area to the city (including the first, and the most recent to be built). Its centrality and ease of access is a key selling point, and it's a truly mixed neighbourhood of residents, businesses and visitors.*

We support this submission document's identification of the Bankside and The Borough area as a "globally significant business district". The Area Vision for Bankside and the Borough, largely coincides with the aspirations of the area's draft Neighbourhood Plan produced in 2016.

In 2013, The Neighbourhood Area for Bankside was formally approved. Following numerous events consulting a wide network of community groups, residents and businesses, a draft version of the Neighbourhood Plan was published March 2016.

We strongly recommend that the Area Vision for Bankside and The Borough, and wider Development Management Policies within the New Southwark Plan, consider and include the following objectives of the draft Bankside Neighbourhood Plan:

- To ensure that new development enables a mixed and balanced community to live in the area, providing accommodation that is suitable for people of different income levels and life stages.
- To ensure a supply of appropriate commercial space for all sizes of business.
- To ensure retail uses serve the needs of the resident, worker and visitor population
- Ensure local people derive benefit from new development across the Neighbourhood Area.
- To improve the quality and quantity of open spaces and public realm throughout the Neighbourhood Area.
- To ensure the local environment and amenity of the area is not harmed by development
- To encourage activity away from the River Thames walkway across the Neighbourhood Area.
- To encourage active and sustainable modes of travel.

Furthermore, we would welcome the New Southwark Plan's explicit recognition of the draft Neighbourhood Plan as a material consideration that forms part of the Borough's Development Plan, to ensure that all development proposals within the Borough are consistent with the policies set out in the draft Neighbourhood Plan. Finally, we would echo the sentiment of Team London Bridge BID's submission that the Development Plan should better set out the weight given to Area Visions in determining planning applications.

#### *OPPORTUNITY AREAS*

London Bridge, Borough & Bankside are listed as Opportunity Areas within The London Plan. Better Bankside welcomes this designation and feel it is appropriate given that the area is continuously evolving, whilst maintaining its unique historical character. However, the NSP has Area Visions that separate Bankside and the Borough with London Bridge.

It would be useful if the Development Plan was able to clarify how the framework of the unified Opportunity Area will work in practice alongside the differing Area Visions. We believe that this clarification should also explain how the various Neighbourhood Plans will be used as material considerations, despite the overlapping boundaries. For example, the Opportunity Area Neighbourhood Plan, London Bridge Plan and draft Bankside Neighbourhood Plan.

#### **STRATEGIC POLICIES**

##### SP2: Social Regeneration to Revitalise Neighbourhoods

Better Bankside's placemaking strategy, known as the Bankside Urban Forest (BUF), is comprised by a programme of projects aiming to create healthier, more attractive and better-connected streets within the Bankside neighbourhood, that respond to the expressed needs of local businesses and residents whilst enhancing and celebrating the many heritage assets that augment its local distinctiveness. Over the last ten years, the BUF has provided a holistic approach that include many of the urban greening, lighting and streetscape improvements outlined within Policy P11.

Better Bankside particularly welcomes point four within Spatial Policy 2; ensuring that development and regeneration schemes enhance the contextual heritage of the area. This Strategic Policy also outlines the importance of creating attractive and appropriately designed public realms that encourage sustainable ways to travel and greening measures. These are in conjunction with Better Bankside's wider objectives relating to BUF's projects affect the public realm.

The list of considerations set out within Spatial Policy 2 identifies how the Council intends to achieve the policy's objectives in revitalising neighbourhoods within the Borough. Point number 3 places specific emphasis on how the local authority will ensure that *"local residents and neighbourhoods prosper from growth through giving people from every community the opportunity to get their voices heard from the earliest point and when decisions are made"*.

Although the Plan's reasoning behind this policy recognises that development proposals ought to *"make sure... businesses are always considered and listened to"* in addition to existing residents, we believe it would be more appropriate to make specific reference to local businesses within Point 3 of the policy. This would

help to ensure that members of the local business community are duly consulted on in order to capture the views of different local stakeholders in equal measure.

We therefore recommend that point number 3 of SP2 makes specific mention of local businesses to ensure an adequate level of stakeholder engagement.

#### SP4: Strong Local Economy

Firstly, point number 3 of the Policy SP4 appears to have an incomplete sentence.

Secondly, the proposed policy fails to recognise any of the Business Improvement Districts (BIDs) operating within Southwark, of which there are five. We believe this is a great shame as BIDs are playing an increasingly fundamental role in many of the public realm improvement schemes across the Borough. What's more, the security and cleaning services offered by BIDs (that are in addition to the Borough's services) help to create a more attractive, safer environment for businesses to work, helping to stimulate and grow the local economy.

We believe it is essential that the Local Plan takes the role of BIDs into consideration; often representing many of the needs of local businesses. We would therefore also welcome part of the policy to indicate how the Council and developers should engage and collaborate with BIDs to ensure the most appropriate design and development outcomes are achieved.

### **DEVELOPMENT MANAGEMENT POLICIES**

#### P11: Design of Places

The NSP's stance on public realm matters is detailed further within Policy P11, expanding on how development proposals must follow some key urban design principles.

Better Bankside welcomes the inclusion of urban design considerations within the Plan and encourage a design policy that ensures development proposals reflect their impacts on the public realm and are shaped by the functionality of the development to the wider street. Moreover, designs should incorporate strategies that seek to make improvements to the surrounding environment in which they are located and be attentive to the local character.

Given the large amount of business activity within the Borough, we believe the policy should make specific reference as to how development proposals will add to the existing uses within the area. The last point of the policy specifies outdoor seating and public realm improvements for residents and visitors. However, we suggest that the policy should also include an appreciation of how the urban realm can serve local businesses.

#### P27: Railway Arches

Policy 27 identifies the opportunities presented by Southwark's historic railway arches and we advocate reinstating the railway arches for commercial and community uses. Whilst Better Bankside are encouraged that the policy supports the delivery of the Low Line as a 'walking route', Policy 27 should also recognise the economic potential offered by the unlocking of the Low Line, as referred to in Policy 49.

#### P30: Town and Local Centres

Policy P30 designates Bankside and The Borough as a District Town Centre within the Town Centre Hierarchy. According to the definitions set out within the New London Plan, Major Town Centres “generally contain over 50,000 sqm of retail, leisure and service floorspace” and “may also have significant employment, leisure service and cultural functions”.

We consider this designation to describe Bankside and The Borough more accurately than the District Town Centre criteria. The indicative uses within Bankside and the Borough are as follows:

- Retail: 31,586 sq.m
- Hotels: c.30,000 sq. m

The information above clearly illustrates that within Bankside and the Borough, there is approximately over 60,000 sq.m of combined retail and hotel space. This is above the criteria for District Town Centres that typically “contain 10,000 – 50,000 sqm of retail, leisure and service floorspace”.

The evidence base informing Policy P30 is comprised in part by the Southwark Retail Study. This document was written in 2015 and already omits several major developments with either full or outline planning consents. This part of the evidence base therefore requires updating, without which, the NSP cannot be perceived as using proportionate evidence that is “adequate, up-to-date and relevant” in accordance with Paragraph 158 of the NPPF.

Furthermore, the Major Town Centre description is more closely aligned with other aspects of the Plan relating to Bankside and The Borough area. Indeed, the NSP’s Area Vision recognises Bankside and The Borough as being “at the heart of the commercial and cultural life of the capital”.

The emerging Local Plan represents the strategic framework for the fifteen-year period up to 2033 and beyond. Paragraph 152 of the NPPF states that Local Plans should “... take account of longer-term requirements and be kept up to date”. Given the rapid increase in office and retail uses in Bankside and the Borough over the course of the existing Local Plan and Core Strategy, the NSP should reflect the area’s role as a Centre over the emerging Plan’s lifetime and the likelihood that this trend is likely to continue, reinforcing the area’s suitability as a Major Town Centre.

This is especially true when considering the area’s designation as an Opportunity Area. The Employment Land Study also forecasts growth of 460,000 sq.m of B1 additional office space to occur within the Borough, up to 2036. It recommends that 80% of this office space ought to be located within the Central Activities Zone encompassing the entire Bankside and the Borough area and is indicative of the neighbourhoods’ expected economic growth.

In this instance, we find the NSP to be unjustified. Paragraph 182 of National Planning Policy Framework stipulates that in order to be considered justified, Local Plans should be the “most appropriate strategy”. We feel that the inappropriate designation of Bankside and the Borough within the Town Hierarchy constitutes a deviation from this National Policy and on that basis renders the Plan unsound.

We suggest that designating the area as a “Major Town Centre” would be more appropriate in light of the above.

P49: Low Line Routes

We welcome the NSP's support to prioritise the 'unlocking' of the Low Line as a strategic, continuous walking route through the Borough, prohibiting development that would adversely impact the objectives as outlined within Policy P49.

We agree with Policy P49, that the Low line offers the potential to stimulate economic growth whilst creating 'attractive routes along railway viaducts and arches'. However, we believe that this policy should elaborate on the potential benefits of the Low Line in relation to air quality and health and wellbeing.

We recommend that the policy explicitly recognises the Low Line as a strategic green link. Encouraging walking along the Low Line will help reduce traffic and P49 should use this opportunity to draw attention to the issue of air quality, demonstrating that as a predominantly pedestrianised route, the Low Line presents healthier route options that are less exposed to harmful pollutants on heavily congested roads.

#### P66: Air Quality

Policy P66 sets out the Plan's policy requirement regarding air quality.

Although there is a lot of focus on domestic impacts, which we support, the policy should outline additional measures for tackling the issue, not solely in relation to boiler types. These could include repairing and/or replacing wood window frames, etc. There should also be a recognition of the impact of behavioural change as well as physical infrastructure improvements.

In both instances, the Submission document fails to signify the role of the Council in achieving these objectives. Nor does the Plan divulge a strategy on how the Council intends to tackle the problems with replacing their boilers for Council-owned properties. Information on feasibility regarding how this will be funded, or potential funding sources would be welcome.

Additionally, there is little detail relating to vehicle emissions and the causes of this – i.e. personal deliveries / businesses-related deliveries. There is also no real mention as to how these will be tackled. We would therefore recommend that Policy P66 acknowledges the issues surrounding vehicle use and air quality and includes an approach to address them.

#### **SITE ALLOCATIONS**

We would welcome more specific indication as to how Open Space will be incorporated into development proposals. These should be included within indicative plans on the Site Allocations Plans.