

OLD BERMONDSEY VILLAGE

OBV

NEIGHBOURHOOD FORUM

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OLD BERMONDSEY VILLAGE NEIGHBOURHOOD FORUM
COMMENTS ON THE DRAFT NEW LONDON PLAN

The Old Bermondsey Village Neighbourhood Forum, designated in 2015 as a Neighbourhood Forum by Southwark Council, was established to help local residents and businesses achieve genuine influence over planning policy in and around Bermondsey. This area, dotted with a plethora of heritage assets and part of the London Bridge Borough and Bankside Opportunity Area, has come under significant development pressure of late – Tall buildings are high on the agenda. This Forum from its inception has encountered dogged resistance from Southwark Council over involvement in key issues such as Tall Buildings and Heritage Assets.

Hereafter we submit our comments on proposals in the Draft London Plan 2017 (DLP). Aside from a marked reduction in the importance given to neighbourhood planning, our overarching criticism is that there is no clear instrument that checks development targets demanded of local authorities (especially in Opportunity Areas) by policies GG2, H1, H2, D6 and D8 against the importance of the preservation and enhancement of the social and built fabric of London highlighted in policies H5, H6 HC1, HC3, HC5, and HC7.

We think there is a need to balance the **opportunities** offered to local authorities in the DLP by way of identifying, protecting and nurturing the distinct identity of areas as the basis for sustainable development versus the **potential abuse of these opportunities by planning departments** – in particular where potential exists for opportunity areas, site allocations and cultural quarters to become used as guises for insensitive profit driven high-rise and mono-use (housing dominated) development.

Neighbourhood Forums should be empowered to have a better part to play in this by the DLP.

The New Southwark Plan for example has just completed formal consultation ignoring widespread calls for a borough wide local list. It contains deeply unsound Area Visions and Site Allocation Policies that ignore local consultation and make no reference to key guidance like Historic England's Advice Note 3 for example.

On Neighbourhood Planning:

We generally support the comments on the DLP by "Neighbourhood Planners London" (attached). We would like to highlight in particular the importance of the following:

We agree with the two main themes put forward namely that the DLP is currently:

- missing a major opportunity to promote neighbourhood planning as a route to achieving its own stated objectives
- giving almost no recognition to neighbourhood planning as an established and statutory part of London's planning system.

With regards to the lack of general reference to Neighbourhood Planning in the DLP (in comparison to 2011) and given the current context of Neighbourhood Planning development we recommend the below additions:

Para 0.0.6 add wording **bold**

The need to ensure consistency with national policies (**including the National Planning Policy Framework**) and international treaty obligations notified to the Mayor by Government, without seeking to repeat national policy.

Para 0.0.10 add wording **bold**

Planning in London is the joint responsibility of the Mayor of London and the 32 London boroughs, the City of London Corporation and the Mayoral Development Corporations (MDCs) **along with neighbourhood forums designated by London's local planning authorities.**

Para 0.0.22 add wording in **bold**

This Plan provides the framework to address the key planning issues facing London. This allows boroughs to spend time and resources on those issues that have a distinctly local dimension and on measures that will help deliver the growth London needs. This includes **neighbourhood plans**, area-based frameworks, action plans and Supplementary Planning Documents, site allocations, brownfield registers and design codes.

Para 0.0.23 replace "two tier" with wording as shown in **bold**

It is crucial that all those involved in planning and development in London understand how London's **three tier planning system (including neighbourhood plans)** works and do not seek to duplicate policy or evidence unnecessarily.

...

With regard to the *missed opportunity* we recommend the following:

Para 1.1.1 add words in **bold**

Londoners come together give the city its cultural character and create its future. Planning for Good Growth means planning for, **with and by** these communities – both existing and new - helping them to flourish and making new connections between them.

Add additional new paragraph 1.1.6 as shown in **bold**

Neighbourhood plans are the most local part of the planning system. Such plans enable Londoners to help to shape the future of their own neighbourhood. They ensure early public engagement in development and regeneration proposals. In the context of the London Plan, neighbourhood plans can contribute local knowledge in the identification of vacant and underused sites suitable for new affordable housing and workspace – a very high priority of the Mayor of London. Greater public input to the selection of such sites, and a wider public understanding of issues of viability and affordability, can be achieved by wider take up of the neighbourhood planning framework across London.

Policy GG1 Building strong and inclusive communities:

Add additional sub-paragraph G as shown in **bold**

Ensure greater involvement of Londoners in planning the future of their neighbourhoods, through widening and strengthening design review processes, early community engagement in major development proposals, and support for neighbourhood plans and place-specific design codes.

Para 1.27 Add wording shown in **bold**

London's distinctive character and heritage is why many people want to come to the city. As new developments are designed, the special features that Londoners value about a place, such as cultural, historic or natural elements, can be used positively to guide and stimulate growth, and create distinctive, attractive and cherished places. Local people are best placed to identify what makes a place special.

Neighbourhood plans can help to recognise what makes the character and heritage of different areas distinctive and provides a vehicle for identifying locally important heritage assets and for designating Local Green Spaces where these meet the criteria set out in Paragraph 77 of the National Planning Policy Framework (NPPF).

Policy GG2 Making the best use of land

Add sentence at foot of policy as shown in **bold**

Those involved in planning and development now includes London's neighbourhood forums. These bodies can play an important role in contributing local knowledge and fine-tuned neighbourhood policies

contributing to the above objectives in ways that ‘generally conform’ with Local Plan and London Plan strategic policies.

Alternatively the above could be incorporated into a re-writing of points B and C (of GG2) and mention given to Historic England’s Site Allocations guidance (local understanding of place).

Policy CG4 D Delivering the Homes that Londoners Need

Add wording shown in **bold**

Identify and allocate a range of sites, including small sites, to deliver housing locally, supporting skilled precision-manufacturing that can increase the rate of building, and planning for all necessary supporting infrastructure from the outset. **Neighbourhood plans can play a significant role in meeting this objective.**

Para 2.0.4.

Add wording shown in **bold**.

The London Plan has a clear focus on delivery – something that will require all stakeholders to work together to unlock sites and drive the right sort of development. Infrastructure is key to this delivery and will require major investment in transport, with Opportunity Areas clustered into growth corridors; and proper planning of utilities and communications capacity and the social infrastructure that supports the day-to-day lives of Londoners, well in advance of new development. Opportunity Area Planning Frameworks and Local Plans should have clear strategies for their delivery. **Neighbourhood Plans also have a role, as a localised and responsive part of the planning system, which can adjust at speed to changed circumstances. Such plans can also lead to greater engagement and support from local people in areas of major change.**

Policy D1 London’s form and characteristics

Add additional wording shown in **bold**

Development Plans (**including neighbourhood plans**), area-based strategies, and development proposals should address the following:

Policy D2 Delivering Good Design

Add additional wording shown in **bold**

To identify an area’s capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area based strategies, which covers the following elements. **London’s neighbourhood forums can assist with this process, through plan preparation, holding design charrettes, forming site briefs and through discussions on individual sites and locations. Such involvement in what constitutes ‘Good Growth’ at specific sites is important to the delivery of the London Plan.**

In terms of community involvement the current Statement of Community Involvement (SCI) in Southwark for example is out of date and its Area Visions and Site Allocations policies

have not been meaningfully consulted upon. Still the NSP has completed Formal Consultation on the Proposed Submitted Version and it should not be left to the last stage (inspector's scrutiny) for the shortcomings to be brought to light:

While the Mayor is not required to publish a SCI in relation to the London Plan, we consider that Parliament's intentions on increased public involvement in neighbourhood planning should be recognised in the London Plan as well as Borough Local Plans and their accompanying SCIs.

The present London Plan at paragraph 8.4 states "(The Mayor) recognises that community and voluntary groups, local business organisations and other interest groups have particular contributions to make to planning decisions, plans and strategies to shape neighbourhoods (see Policy 7.1 and paragraph 7.6) and will support their involvement. He will also consider what guidance and support it would be appropriate for him to offer to aid neighbourhood planning."

This further guidance has never appeared. The 2014 Mayoral SPG (London Planning Statement) sets out at section 3 the relationship between the London Plan and neighbourhood plans, and how the Mayor will address issues of 'general conformity'. This material does not re-appear in the draft London Plan, and will cease to apply once the new Plan is in place. **This guidance needs to be refreshed and reinstated in the final London Plan.**

With regards to *good growth* we recommend the following:

Paragraph 3.27

Add additional wording **in bold**

The Mayor has produced guidance on design reviews, including how panels and processes should be managed. All development proposals should follow this guidance, and to be subject to a level of scrutiny appropriate to the scale of the site. This design scrutiny should include work by planning case officers and ongoing and informal review by qualified urban design officers as well as formal design review. **Wider involvement of local residents and community groups in design review is encouraged, to harness local knowledge and improve engagement between local communities and those making decisions on development in London.**

With regards to the London Plan's general omission of references to Neighbourhood Planning (as noted above) we recommend that it should clarify its position on para 184 of the NPPF:

"Neighbourhood planning provides a powerful set of tools for local people, to ensure that they get the right types of development for their community. The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic

policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible.”

Arising from this is the further question of it's *duty of support* to neighbourhood planning:

National Planning Practice Guidance explains this as follows:

“provide advice or assistance to a parish council, neighbourhood forum or community organisation that is producing a neighbourhood plan or Order as required by paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended).”

This duty is not precisely defined, the relevant section of the Act stating that a local planning authority *“must give such advice or assistance to qualifying bodies as, in all the circumstances, they consider appropriate for the purpose of, or in connection with, facilitating the making of proposals for neighbourhood development orders in relation to neighbourhood areas within their area”*.

This duty of support should be clarified in the DLP not least so that neighbourhood forums can be given due support where their host councils are “unable” for whatever reason to allow for their proper, full and efficient development.

General comments on the DLP:

General comments on the DLP are detailed in tabular format in Appendix 1 hereafter.

These comments follow from our visions / emerging policies and from our attitude towards sustainable development, as well as our experience to date of the shortcomings in local planning practice in Southwark - both with regards to neighbourhood planning and generally.

We would like to attend the Examination in Public and have our representations heard in further detail.

Yours Sincerely,

T O'Connor
OBVNF

APPENDIX 1

Old Bermondsey Village Neighbourhood Forum
General Comments on the Draft London Plan 2017

The New London Plan

Comments from Old Bermondsey Village Neighbourhood Forum

OBF Topic	Relevant NLP Section	Details / Proposed Changes
<p>Meaningful engagement with local communities and better transparency in local planning practice:</p> <p>NLP should better promote Local Authority cooperation with Neighbourhood Planning and early engagement with local communities at a strategic as well as local level.</p> <p>The NLP should also help ensure greater transparency with regard to the development of local plans and treatment of planning applications.</p>	<p>Chapter 1 Good Growth</p> <ul style="list-style-type: none"> - Policy GG1 Building strong and inclusive communities - Policy GG2 - Making the best use of land <p>Chapter 2 Spatial Development Patterns</p> <ul style="list-style-type: none"> - Policies SD1-SD10 with reference to 	<p>As per our proposed additions to GG1 (community design reviews and place-specific design codes) and GG2 (role of neighbourhood fora) there should be more emphasis on early engagement with communities in order to tap into local knowledge. This should strengthen paragraph C of GG2 and make it harder for local authorities to refuse to embrace Local List initiatives and ignore guidance like Historic England Advice Note 3 in the development of Site Allocation Policies.</p> <p>Policy SD1 B 2) “Londoners” should be appropriately replaced with terminology that gives direction for councils to carefully assess the needs of existing economic networks and residential communities at a local level.</p> <p>Policy SD1 B 5) should be adjusted or reference be made therein to other policies (C6) to strengthen the protection and encourage more new provision for existing local and independent businesses to (stay in their networks and) be allowed to grow. This should encourage the provision of affordable, flexible and multi-sized spaces for all scales of businesses. The idea that light industry can not mix viably with housing should redressed so that erstwhile industrial/commercial buildings are not permitted to wither and subsequently be substituted for profit driven new –build residential development. Similarly the encouragement of temporary/interim uses of vacant buildings (both council and private, in OAs and Town Centres) should serve to facilitate community orientated cultural and workspace uses.</p>

<p>Tall Buildings:</p> <p>Maps of tall building locations specifying height limits (contour maps) should be properly enforced in local plans.</p>	<p>Chapter 3 Design</p> <ul style="list-style-type: none"> - Policy D1 - London's form and characteristics - Policy D2 - Delivering good design 	<p>Policy SD8 B 1) should be reconsidered to encourage boroughs to think less about town centre boundaries as an in-or out tool and more as a threshold zone where detailed consideration of the local context should be encouraged through meaningful community consultation. In terms of building height issues for example, overall contour maps (which can also be informed by consultation) from "centre" to periphery as such may be more appropriate and avoid town centre boundaries laying waste to / making a mockery of conservation areas.</p> <p>Policy SD9 C 1-3) should be strengthened by making further reference to local business, resident groups and neighbourhood fora.</p> <p>Policy SD10 A B and C should be strengthened / given more weight to ensure boroughs actually undertake meaningful local engagement. Greater transparency should be afforded by these policies whereby viability issues should be discussed strategically and developers be forced to consult with communities "at the beginning" rather than in the superficial way that exists at present - to note: local authorities such as Southwark Council currently place the blame / pass the buck here on the lack of sanctions applicable from the Localism Act's encouragement / guidelines on this subject.</p> <p>In addition to the comments already made regarding the role of neighbourhood fora in these policies:</p> <p>D1 A 3) "street based" should make reference to existing forms / patterns / grains that contribute to a sense of place (history) or functioning of place (economic or social networks).</p> <p>D1 A 10) should make specific reference to the positive / necessary role of "yards" / "yardspace" (in relation to the previous point)</p> <p>D1 B 1) - new frameworks for local consultation should be considered to inform an understanding of the "local context" in the terms described.</p> <p>D1 B 6) - should be developed to make reference to "public" space</p> <p>D2 7) - should be developed (in accordance with comments on chapters 1 and 2 above) and given more overall weight in D2</p>
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Chapter 3 Design

- **Policy D6** - Density
- **Policy D7** - Public Realm
- **Policy D8** - Tall buildings

D6 A 1) “the site context” is currently meaningless and opens the door to insensitive / unsustainable development as it is too vague.

D6 as a whole should be reconsidered so as to avoid it providing the ultimate fuel for developer viability claims and by extension enabling insensitive and unsustainable developments to cause catastrophic damage to local contexts in terms of history, character / sense of place as well as the functioning of the local economy.

Policy D7 D and E should be clear on how the phrase “individual characteristics of the area” and the term “vibrant” are to be understood / defined (and policies J and K further developed) in terms of innovative and appropriate frameworks for the assessment of local character and local need that ensures compliance with the Public Sector Equality Duty.

Policy D8 is incredibly important but is not being adhered to in any way by local councils like Southwark Council who in their Local Plan fail to conform: it effectively indicates that tall buildings can be located anywhere in the borough, (unless they interfere with strategic / borough views) and does not indicate any attempt to identify locations in conjunction with the Mayor while also giving no definition of a tall building in terms of height - either “generally” or in “location specific” terms.

Boroughs should be required to have a **Local List** and Neighbourhood Plans should be encouraged to facilitate this in their areas and fast tracked to bring forward specific “**site briefs**” framed by local knowledge with a view towards encouraging community orientated (and / or owned) developments of all scales.

Heritage and Conservation:

Boroughs should be required to have a **Local List** and Neighbourhood Plans should be encouraged to facilitate this in their areas and fast tracked to bring forward specific “**site briefs**” framed by local knowledge with a view towards encouraging community orientated and owned developments of all scales.

The functioning of Conservation Areas in planning practice should be reviewed by the GLA in terms of boroughs overall strategies and the CA boundaries and the effective weight they actually have in the shaping of the development. This is because councils are currently ignoring their CA policies in favour of high-rise housing to meet their targets (and solve their debt issues).

Chapter 7 Heritage and Culture

- **Policy HC1** - Heritage Conservation and Growth
- **Policy HC3** - Strategic and Local Views
- **Policy HC5** - Supporting London’s Culture and creative industries
- **Policy HC7** - Protecting London’s Public Houses

This should be informed by Historic England guidance:

“Local lists play an essential role in building and reinforcing a sense of local character and distinctiveness in the historic environment. Local lists can be used to identify significant local heritage assets to support the development of Local Plans. Encouraging the use of local lists will strengthen the role of local heritage assets as a material consideration in the planning process...”

“Moreover Local Lists are usually made very effectively in partnership with local residents through occasional appraisal and/or a nomination system which recognises and takes advantage of local residents’ knowledge, and highlights community value assets. This is invaluable in engaging the local community in the effective conservation of their neighbourhood’s heritage. “

“At its heart, local listing provides an opportunity for communities to have their views on local heritage heard. It recognises that the importance we place on the historic environment extends beyond the confines of the planning system to recognise those community-based values that contribute to our sense of place.

By contrast in Southwark the council are on the one hand obstructing neighbourhood planning by turning down the energies of the neighbourhood forum who offered to kickstart a borough wide local list (evidence base). Thus in place of a deep and detailed understanding of the area (an independent audit of the local economy and cultural uses for example) the Council are relying on a BID (Team London Bridge) on the other hand to plan the area for them - or rather to hold exhibitions for developers of windfall sites on St Thomas Street - this is clearly the opposite of community inclusive local planning informed by proper consultation and does not constitute the collection of an evidence base that allows for review / that can inform the Sustainability Appraisal. Their site briefs, unsound as they are, are currently trumping / bypassing heritage and conservation policy.

The functioning of Conservation Areas (CA) within planning practice should be reviewed in conjunction with / by the GLA in terms of a Council’s overall strategy and the actual CA boundaries in terms of the effective weight they actually have in the shaping development.

As per our comments on Chapter 1 “Good Growth” and Chapter 2 “Spatial

<p>Housing:</p> <p>Pressure to deliver housing targets is currently destroying the distinct character of places as well as existing communities and the functioning of the local economy.</p> <p>Community developments, site briefs and open spaces:</p> <p>NLP should enable local communities to have greater power in identifying and taking on sites for community developments (limited presently to ACVs which have limited success aside from with Pubs) and in shaping the briefs for key local sites and public spaces.</p> <p>Site Allocations in the New Southwark Plan for example are deeply unsound on all counts due to a superficial understanding of sites and vague wording resulting in incoherent and unsustainable briefs</p>	<p>Chapter 4 Housing</p> <ul style="list-style-type: none"> - Policy H1 - Increasing housing supply - Policy H2 - Small Sites - Policy H5 - Delivering Affordable Housing - Policy H6 - Threshold approach to applications - Policy H9 - Vacant Building Credit - Policy H10 - Redevelopment of existing housing and estate regeneration <p>Chapter 3 Design</p> <ul style="list-style-type: none"> - Policy D1 - London's form and characteristics - Policy D2 - Delivering good design - Policy D7 - Public Realm <p>Chapter 8 Green Infrastructure</p> <ul style="list-style-type: none"> - Policy G4 - Local green and open spaces 	<p>Development Patterns” direction should be given here for councils to carefully assess the needs of existing residential communities and existing social and economic networks to frame their strategy. These assessments should be informed by meaningful local consultation and take into account emerging policies of Neighbourhood forums.</p> <p>The NLP should enable local communities to have greater power in identifying and taking on sites for community developments (limited presently to ACVs which have limited success aside from with Pubs) and in shaping the briefs for key local sites and public spaces.</p>
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