

RE: City Plan 2040 - Update

planningpolicy [REDACTED]

Mon 6/17/2024 11:36 AM

To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>; Environment - Local Plan <LocalPlan@cityoflondon.gov.uk>

Cc: Kane, Kerstin [REDACTED]

 1 attachments (51 KB)

City of London Draft City Plan 2040 LB Southwark Response Final 17.06.pdf;

THIS IS AN EXTERNAL EMAIL

To whom it may concern,

Thank you for the opportunity to review the Draft City Plan 2040, please find attached the London Borough of Southwark's comments on the draft plan.

Could you please acknowledge receipt of this letter?

Kind regards,

Calum Chipman*On behalf of the Planning Policy Team*

Planning Policy and Monitoring Innovation | Finance

Planning and Growth

London Borough of Southwark | 160 Tooley Street | London SE1P 5LX

From: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>**Sent:** Wednesday, May 29, 2024 2:22 PM**Subject:** City Plan 2040 - Update

Dear stakeholder,

The Proposed Submission Draft City Plan 2040 was approved by the Court of Common Council on 7 March 2024 and is now currently out for Regulation 19 consultation. Following a request from a number of stakeholders to extend the consultation, it has been decided to move the deadline, from Friday 31 May to **Monday 17 June**. The two-week extension is in the interest of fairness and will ensure that every voice has the opportunity to be heard.

The Plan and the proposed submission documents are available here: [City Plan 2040 - City of London](#).

Have your say here: <https://cityplan2040.commonplace.is/>

Kind regards

Planning Policy Team,

Environment Department,

City of London

Email enquires only: localplan@cityoflondon.gov.uk



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Planning Policy and Monitoring Innovation

Planning and Growth
London Borough of Southwark
London
SE1P 5LX

17 June 2024

Planning Policy Team
City of London

To whom it may concern,

The London Borough of Southwark (LB Southwark) supports the City of London submission of their Draft City Plan 2040 (Local Plan) for Regulation 19 Consultation.

LB Southwark appreciates the opportunity to review the Draft City Plan 2040 and commends the City of London Corporation on their forward-thinking approach to shaping the future of the Square Mile.

The City of London borders Southwark to the north. The two authorities are separated by the River Thames, but connected via six river crossings (London Bridge, Southwark Bridge, Cannon Street Railway Bridge, Millennium Bridge, Blackfriars' Railway Bridge, and Blackfriars Bridge).

The City of London and LB Southwark agreed upon a 'Statement of Common Ground' in May 2024. This is a live document which will be reviewed and updated when either party reaches a critical stage in plan-preparation and will form a key part of implementation of Local Plan policies and reviews.

LB Southwark supports the spatial strategy and strategic priorities that the Draft City Plan 2040 aims to deliver. The strategy emphasises the importance of collaborating with surrounding boroughs and the Greater London Authority (GLA) to support economic growth by attracting investment, supporting businesses, and creating employment opportunities.

Housing

LB Southwark welcomes the City's commitment to providing new dwellings within the City, in line with regional strategic housing needs, and ensuring the delivery of a minimum of 50% affordable housing on public sector land.

It is noted that the City of London approach to Gypsy and Traveller sites provision, similar to the rest of London, is awaiting the outcomes of the pan-London Gypsy and Traveller Needs Assessment.

Offices, Retail, and Culture

The enhancement of office spaces, retail areas, and cultural facilities is essential for the economic vitality of London. The proposed policies contained within the draft plan align with Southwark's goals to foster vibrant, mixed-use neighbourhoods.

Design

The City Plan 2040 places a strong emphasis on environmental sustainability. Specific mention is made of working with adjacent boroughs on initiatives like air quality improvement, sustainable drainage systems (SuDS), and biodiversity enhancement.

The Draft City Plan 2040 adopts broad and ambitious targets such as zero carbon and zero waste, imposing strict requirements on developers. The inclusion of retrofit first approach throughout the plan is welcome.

Transport

The City Plan 2040 sets out the need for integrated transport infrastructure, recognising that cooperation with TfL and adjoining boroughs can help to ease traffic congestion, aid in public transport integration, and improve active travel routes.

Southwark is connected to the City of London via important north-south routes, which include London, Southwark, and Blackfriars Bridges. While the Draft City Plan 2040 makes specific reference to LB Southwark and acknowledges the importance of cross-boundary coordination, the Plan may be aided by the inclusion of specific examples of how developments at borough intersections should handle potential issues, in addition to high-level projects with regional impact.

The Proposed Street Hierarchy contained within Policy S9 labels London Bridge / Gracechurch Street / Bishopsgate as 'City Access' rather than 'London Access'. As these streets are part of the TfL network and make up an important pedestrian, cycling, and vehicular route (of special importance to LB Southwark), please can this be checked that this is not London Access.

Heritage & Tall buildings

LB Southwark is broadly supportive of the Plan's approach to tall buildings within the City of London, which focuses sustainable design and the impact of tall buildings on the public realm, ensuring they contribute positively to the City's skyline and streetscape.

Policy S12 of the Plan directs proposals for tall buildings to two ‘Tall Buildings Areas’ – the ‘City Cluster’ and ‘Fleet Valley’. Policy S13 of the Plan addresses protected views and outlines that development within the City should have ‘regard to views of the city designated by other LPAs’. These elements of the plan are welcomed by LB Southwark as they protect Borough views of the City (particularly of St Paul’s) that are specifically included within the Southwark Plan. However, should proposals for tall buildings outside of these ‘Tall Buildings Areas’ be proposed, Southwark Council would seek to ensure that Policy S13 is instructional to City of London officers and that the Council is consulted on proposals with the potential to affect protected views laid out in the Southwark Plan 2022.

This is laid out with the ‘Statement of Common Ground’ signed between the two authorities in May 2024, where both parties agreed to have regard to cross border strategic and local views when determining applications and consult each other on any proposals that could impact on these views. By establishing collaborative frameworks, early consultation processes, and aligned policies, both boroughs can effectively manage and protect their valued views, ensuring that new developments enhance rather than detract from London’s unique cityscape.

Climate Resilience

LB Southwark commends the City’s commitment to climate resilience, as outlined in Policy S15. The focus on ensuring the City adapts to climate challenges, such as more frequent extreme weather and flooding, aligns closely with Southwark’s own priorities.

Climate Resilience is a shared responsibility that requires co-ordinated efforts between the two boroughs to address flood risk management, urban heat island mitigation, and climate adaptation strategies. It is noted that Southwark and the City of London share a section of the River Thames that is not currently covered by a Joint Thames Water Strategy. Southwark would welcome further discussions on any strategic flood issues as Southwark explores the development of the Environment Agency’s requirement for a Riverside Strategy.

The Temple, the Thames Policy Area & the Key Areas of Change

Policy S17 underlines the importance of the River Thames for transport, recreation and as a unique setting for views of Central London. The policy notes that there is currently no joint strategy for the central section of the Thames between Chelsea and Tower Bridge, and that the City Corporation will work actively with neighbouring boroughs to help produce a joint Strategy.

LB Southwark welcomes further discussion with the City Corporation on the formulation of such a strategy. However, the policies contained with the Plan relating to the Thames are welcomed.

Waste

As noted in the signed SOCG from May 2024, there are no significant commercial waste movements arising between LB Southwark and the City of London. The approach to the circular economy and waste reduction is supported. We would be grateful if the City of London confirms that there are no changes to the pre-existing agreements, i.e. The Southeast Joint Technical Waste Paper.

Thank you for considering our feedback. We are available for further discussions to align our efforts and achieve our common goals.

Yours sincerely,

Juliet Seymour

Head of Policy, Building Control and the Historic Environment
Southwark Council