

Representation	Officer Response
<p data-bbox="188 316 533 347">Old Kent Road Area Vision</p> <p data-bbox="188 357 470 424">Organisation: GL Hearn NSPPSV17.4</p> <p data-bbox="188 467 1223 568">Other than the above comments, as future applicants of sites within the Borough, the policies set out within the New Southwark Plan, particularly in relation to the Old Kent Road Opportunity Area, are supported.</p>	<p data-bbox="1263 357 1447 389">Support noted.</p>
<p data-bbox="188 612 577 679">Organisation: Aviva and Galliard NSPPSV18.1</p> <p data-bbox="188 719 1200 786">We write to provide representations to the New Southwark Plan ('NSP') on behalf of Aviva Investors Pensions Limited ('Aviva') and Galliard Homes Limited ('Galliard').</p> <p data-bbox="188 826 1227 967">Aviva owns the Cantium Retail Park on the Old Kent Road. It is preparing the redevelopment of the Cantium Retail Park with Galliard as a Joint Venture partner for a range of uses including, residential, retail, office and other commercial uses in accordance with the emerging Old Kent Road Area Action Plan ('OKRAAP').</p> <p data-bbox="188 1007 1169 1074">We are instructed to submit comments objections and requests for clarification in respect of the New Southwark Plan Proposed Submission Version Consultation.</p> <p data-bbox="188 1114 1223 1222">It is understood that this is the final round of consultation before the Plan is submitted to the Secretary of State for Examination. The role of this consultation is therefore to assess whether the emerging Plan is: 1) Legally compliant; and 2) Sound.</p> <p data-bbox="188 1262 1236 1370">Below we provide our comments that require further clarification and / or amendments to the relevant Policies are supporting text to ensure that the Plan is legally compliant and sound having regard to its deliverability and application.</p> <p data-bbox="188 1410 224 1436">...</p>	<p data-bbox="1263 612 1536 644">Representation noted.</p>

For the New Southwark Plan to be found sound under the four tests of soundness as defined by the NPPF (paragraph 182) the Plan should be positively prepared, justified, effective and consistent with national policy.

The Proposed Submission Version, as currently drafted, is considered to be broadly legally compliant and sound subject to the suggested minor material amendments that are put forward within this representation being made.

This will ensure that upon adoption the New Local Plan will be consistent with other emerging documents, such as the Old Kent Road AAP, and together with this will provide a policy framework which will afford sufficient flexibility to the delivery of key sites within the identified Opportunity Areas.

We trust that these comments are helpful, and would be happy to discuss any of the issues raised in more detail.

On behalf our client, we request that we are kept up to date on the progress of the New Southwark Plan which will include notifying us when it is submitted to the Secretary of State.

Organisation: Capital Industrial
NSPPSV30.1

Background

Our client is the freehold owner of several industrial properties located in the Old Kent Road Opportunity Area. These are T Marchant Trading Estate on Verney Road, 40-50 Hatcham Road, 188-196 and 202 Ilderton Road, and 137 Ormside Street, and Canterbury Industrial Park on Ilderton Road. The accompanying site location plans (ref: 17-00415_SLP01, 17-00415_LSP02 and 17-00415_SLP03) identify our client's ownership. These sites are currently occupied by industrial/warehousing operators. Our client has invested in refurbishment of some of the premises as they wish to ensure high occupancy, until the sites can be brought forward for redevelopment in the

Noted. The Area Action Plan sits alongside the Local Plan to form the Development Plan which is the keystone of determining development.

medium to long term. Bearing in mind that the wider area's strategic planning objective as the Old Kent Road Opportunity Area ('OKROA') both in the adopted and emerging new London Plan and the emerging new Southwark Plan, our client recognises that their sites are key part in facilitating the Mayor and the Council's strategic visions and regeneration objectives for the OKROA. As such, they wish to ensure that there is a positive planning policy framework for securing viable and deliverable redevelopment of our clients' sites, while ensuring that the sites' existing tenants/operations are not undermined by developments coming forward in the short term.

Our representations, as set out below, are based on the tests of soundness (whether it is justified, effective or consistent with national policy) as set out in the National Planning Policy Framework ('NPPF').

...

Conclusion

We consider that the Proposed Submission New Southwark Plan is unsound as currently drafted, as detailed above. Whilst we support the strategic objectives and policies for the Old Kent Road Opportunity Area, we consider that there are a number of policy requirements which could undermine the delivery of a viable development scheme.

Organisation: Capital Industrial
NSPPSV30.7

Old Kent Road OA

Our client's sites are designated in the following key development opportunity sites in Old Kent Road:

NSP67 (Sandgate Street and Verney Road) – T Marchant Trading Estate

NSP69 (Hatcham Road and Penarth Street) - 40-50 Hatcham Road, 188-196 and 202

Ilderton Road.

NSP70 (Ilderton Road) – Canterbury Industrial Estate.

Support noted. The OKR Area Action Plan sets out the masterplan for the area to ensure co-ordinated redevelopment in the area.

The vision map sets out where open spaces should be provided in the area. The OKR Area Action Plan sets out more specific details on open space and its delivery. Where this cannot be provided, this will need to be justified.

We support the strategic objectives for Old Kent Road with significant growth opportunities both in terms of residential units and jobs, through regeneration of the area. We agree that the emerging Old Kent Road Area Action Plan should identify more detailed opportunities for growth. We also request that the role of the Area Action Plan should be made clear in that it should provide a clear masterplan and delivery mechanism to ensure coordinated delivery of major regeneration of the area. We consider this to be necessary so that strategic infrastructure requirements (such as public open space) are delivered whilst ensuring the deliverability and viability of each development sites.

With regard to “New Greenspace” identified on the Old Kent Road Vision Map, the delivery mechanism and feasibility for this strategic infrastructure have not yet been considered. It is also not clear whether land is available to deliver the extent of the greenspace identified on the Vision Map without undermining the deliverability and viability of the allocated development sites. Therefore, the Vision Map should make clear that “New Greenspace” is indicative.

Individual
NSPPSV31.2

AV.12.1
Internal consistency

The Old Kent Road contains more than “pockets of heritage surviv[ing] from different eras including the Livesey gasworks and the ceramic mural which tells the story of the Old Kent Road.” There are many buildings which must be protected in the development. The NSP only refers to “reinforc[ing] the high street” in various development sites. If Southwark Council does not protect these buildings they will be lost. As it mentioned in P11 “Research in the Old Kent Road area has shown that character ... influences community cohesion ...”

Representation noted.

Gasholder no.13 is listed as is the ceramic mural. Some of the materials from the smaller gasholders that have been dismantled have been kept and will be used in the “Ruby Triangle” development on the Ruby Street. In addition, Policy P71 Local List aims to protect locally listed and heritage assets. This policy, as part of the strategic policy overarching the site allocations will further protect these assets.

The Surrey Canal Walk is a green corridor and serves both purposes. The OKR Area Action Plan sets out the plans for parks and open space in Old Kent Road, which includes new parks and green links.

AV.12.2

Not effective

“Link[ing] existing open spaces like Burgess Park to each other and new park spaces to provide a “Greener Belt” network accommodating play, sports, growing spaces, nature and places to just sit and contemplate” sounds promising. However, the Surrey Canal Linear Park [OKR NSP65 and 67] looks like a transport (cycling) corridor which cannot provide adequate play spaces etc. If building developments contribute to this type of limited green space then local people will be short changed. The extant Surrey Canal Walk has proved inadequate in providing play space or somewhere to relax.

AV12.3

Not internally consistent nor effective
and not consistent with New London Plan

“The Area Action Plan will identify the opportunities for growth and benefits for local communities including ... a new major town centre for shopping”.

“Town centre” is mentioned in: OKR NSPs 55, 58, 60, 62, 63, 65, 66, 68, 71, 72 73, 74 which spreads a long way along the Old Kent Road. It is not clear where or what is proposed by a town centre in the NSP.

Tall buildings are mentioned in OKR NSPs 55, 57, 65, 66, 67, 68, 70, 71, 72. Again this is a wide spread area which does not suggest conforming to the prerequisites of P14 nor to good planning -- see NLP Chapter 1 Planning London’s Future (Good Growth Policies) Taller buildings along the Old Kent Road are currently: Bird in Bush Road: 14 storeys; Rotherhithe New Road: 19 storeys; Avondale Square 20/21 storeys; Leyton Square: 4/6 storeys. What constitutes a tall building has not been defined for the Old Kent Road nor the proposed frequency or density.

Policy P16 (tall Buildings) sets out further guidance on tall buildings and how they will be assessed within planning applications. Some of the site allocations also set out where tall buildings may be possible.

Organisation: Education and Skills Funding Agency
NSPPSV55.10

Support noted.

8. The ESFA supports the continued inclusion of requirements for new or expanded schools in site allocations NSP04, NSP10 and NSP40 and supportive statements on

provision of school places in area visions AV.05, AV.06, AV.07, AV.12 and AV.14.

Organisation: Elephant and Amenity Network
NSPPSV57.25

The plan is fundamentally unsound because OKR is not Central London and the London Plan does not include it in the Central Activities Zone. The OKR is distinctive, and the vision should be to enhance this distinctiveness. A thriving industrial base, genuinely affordable (social) housing, sustainable and diverse communities, migrant and ethnic businesses, a community-oriented cultural offer, a rich network of faith based activity – these are the elements that make the OKR what it is, that make it attractive to the people who live and work here, and that give it a purpose in the wider London economy.

The NSP vision is unsound because it is completely dependent on the Bakerloo Line Extension (BLE). Considering the absence of secure funding for this extremely expensive infrastructural project, we feel that tying the vision to the BLE is far too risky. The proposed construction of more than 20 000 new homes is too high and arbitrary a number. There is no clear explanation of how it was reached, and there has been no discussion around it. It also anticipates an almost complete removal of existing industry. This would be catastrophic for many of the 10 000 jobs in the area

There is no provision for community engagement. Residents, businesses and local groups have the power, desire and knowledge to shape their neighbourhoods, and this should be a central element of the vision.

To make the vision sound, the following changes are needed:

- Maintain the Preferred Industrial Location status for existing industrial clusters. This would preserve the distinctive character of the area and allow the local economy to grow in an organic and flexible way.
- Provide explicit acknowledgement of the unique migrant and ethnic businesses operating in the area, and outline how it will preserve this fabric and comply with Equality & Diversity duties.

Representation noted.

Old Kent Road is a major transport route into Central London. Its distinctiveness is recognised and enhanced within the vision and the Old Kent Road Area Action Plan.

Development will be phased based on the commitment and delivery of the Bakerloo Line extension. It is anticipated around 9,500 homes will be committed in Phase 1 (2018-2023) alongside enhancements to the existing public transport network prior to the confirmation of the Transport and Works Act Order for Bakerloo Line extension. The remaining 10,500 will be committed for Phase 2 (2023-2027) and will be subject to agreement between Southwark Council, the Greater London Authority and Transport for London relating to the status of transport improvements. A detailed phasing plan is included in the New Southwark Plan Infrastructure Plan and in the Old Kent Road Area Action Plan. The OKR Area Action Plan also seeks to increase the number of jobs in the area from approximately 10,000 to 20,000 jobs.

Our evidence base recommends the protection and support of employment floorspace and this is reflected in the requirements in Policy P28 (Strategic Protected Industrial Land) and the site allocations where we expect to see re-provision of floorspace at least and growth in some areas to generate jobs. Policy P30 (affordable workspace) also adds a further layer of protection for small and independent businesses and requires the full consideration of the feasibility of providing affordable and suitable space for existing occupiers in the completed development.

The requirements for community engagement are set out in the

- Green infrastructure should be reinforced with new green routes and streets around existing industrial sites, rather than through them.
- Promote the growth of culture and arts by securing affordable and accessible spaces for bottom up initiatives, such as DIY Space for London or OKR Studios.
- Clarify the vision of the OKR as a high street.

Statement of Community Engagement, which is currently being revised. This includes a Development Consultation Charter to require greater consultation from developers at all stages of the planning process. This requires developers to clearly recognise and engage with local residents and to provide a Equalities Impact Assessment with their pre-application request and planning application where necessary.

This will be acknowledged under commitments made by Southwark Council in the Statement of Community Involvement and the emerging Development Consultation Charter and the Social Regeneration Charter.

The proposed green infrastructure around existing sites encourages connections between spaces. The site allocation is not prescriptive on this to allow for flexibility of the site allocation.

Policy P30 (affordable workspaces) sets the requirement for affordable workspace on sites proposing 500sqm GIA or more employment floorspace (B class use). Policy P45 (leisure, arts and culture) also encourages leisure, arts and culture in the borough.

Policy P34 (town and local centres) identifies that Old Kent Road comprises Old Kent Road north and Old Kent Road south which are designated as district town centres.

The vision of Old Kent Road as a high street is also set out in the emerging Old Kent Road Area Action Plan.

Organisation: GLA
NSPPSV66.1

Noted.

Thank you for consulting the Mayor of London on the Proposed Submission Version of

the New Southwark Plan (NSP) and for extending the consultation deadline to allow for additional meetings between Southwark, GLA and TfL officers. As you are aware, all development plan documents must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has delegated authority to me to respond and his representations are set out below. Representations from Transport for London (TfL), which I endorse, are set out in Annex 1.

The Mayor commented on the previous draft version of the New Southwark Plan Part One: Strategic Policies and Development Management Policies in a letter dated 12 February 2016 and on Part Two: Area Visions and Site Allocations in letters dated 2 May 2017 and September 2017. All letters highlighted elements of the draft document that could raise issues of non-conformity as well as providing more general comments.

GLA officers have had meetings and exchanged emails with Southwark officers over the past year to discuss conformity issues. However, there are still some outstanding matters which need addressing, specifically town centre classification and loss of SIL. It is hoped that these issues can be addressed prior to examination of the New Southwark Plan and my officers would be pleased to assist Southwark officers in finding ways to achieve conformity with the London Plan.

The London Plan

You will be aware that the Mayor published his draft London Plan for consultation on 1st December 2017. It is anticipated the Examination in Public of the London Plan will take place in Autumn 2018 with publication in Autumn 2019. Once published, the new London Plan will form part of Southwark's Development Plan and contain, where relevant, the most up-to-date policies. Southwark's Local Plan is required to be in general conformity with the current London Plan, however its policies will need to be considered alongside the draft London Plan. The draft London Plan and its evidence base is a material consideration in planning decisions, and gains more weight as it moves towards publication.

In this regard, the Mayor recognises that Southwark is at submission stage and has

prepared its draft Plan and evidence base prior to the publication of the draft London Plan. However, once the draft London Plan is published, Southwark will require a more comprehensive strategy for delivering housing. With regards to large sites in the Old Kent Road area, GLA and Southwark officers continue to work together to identify the full housing capacity of these sites.

General Comments

Southwark is set to deliver a significant amount of new development in the Old Kent Road Opportunity Area. Southwark officers have worked and continue to work with GLA and TfL officers to help the Council realise its growth ambitions for the borough, including up to 20,000 new homes in the Old Kent Road area and an additional 10,000 new jobs. The Old Kent Road Area Action Plan Preferred Options is currently being consulted on and my officers welcome ongoing discussions on the detailed proposals and phasing that will guide development in the Old Kent Road area.

Organisation: GLA
NSPPSV66.22

The Old Kent Road has the potential to deliver around 20,000 new homes and 10,000 additional jobs. The Old Kent Road Area Action Plan (OKRAAP) is at a relatively early stage (Preferred Options) compared to the draft NSP; and Southwark officers have asked that the Mayor include general OKR conformity issues in his response to the NSP. The conformity issues regarding classification of the OKR as a Major Centre and release of SIL have been addressed earlier in this response, however as most of Southwark's SIL and Local SIL (LSIL) is located within the OKR corridor, the Plan should require retained SIL and LSIL sites to be intensified and require important displaced businesses to be relocated.

The document and OKR Area Vision should reference the current status of the proposed Bakerloo Line Extension (BLE), which the Mayor strongly supports but is currently unfunded. (TfL have provided more detailed comments in Annex 1).

Furthermore, a significant part of the case for the BLE relates to its ability to unlock

The Old Kent Road vision now states:

Development will be phased based on the commitment and delivery of the Bakerloo Line extension. It is anticipated around 9,500 homes will be committed in Phase 1 (2018-2023) alongside enhancements to the existing public transport network prior to the confirmation of the Transport and Works Act Order for Bakerloo Line extension. The remaining 10,500 will be committed for Phase 2 (2023-2027) and will be subject to agreement between Southwark Council, the Greater London Authority and Transport for London relating to the status of transport improvements. A detailed phasing plan is included in the New Southwark Plan Infrastructure Plan and in the Old Kent Road Area Action Plan.

Implementation policies in the NSP relating to CIL and S106 obligations, set at a borough-wide and London-wide level that these contributions would have to be made.

new homes and jobs in the OKR area through the step-change in transport capacity and accessibility it will provide. London Plan Policy 1.1 confirms that London should be a city where it is easy, safe and convenient for everyone to access its jobs, opportunities and facilities and the draft London Plan introduces the concept of good growth.

Growth of the scale anticipated for Old Kent Road will require very significant increases in public transport capacity to ensure the area will be sustainable in transport terms. It is therefore vital that the AAP sets out a clear and effective mechanism for linking development with transport capacity and BLE delivery.

It is understood that the details of such a mechanism are intended to be set out in the OKR AAP; however, the draft NSP and AAP must be closely aligned and the draft NSP should clearly set out the principles of linking development with BLE delivery. In summary, the draft NSP should:

- Make clear that the BLE is required to support the scale and ambition of the growth the draft NSP and AAP envisage.
- Acknowledge that new development will be expected to contribute towards the delivery costs of the BLE and other transport improvements.
- Include reference to a mechanism for phasing development in advance of the BLE, recognising not all sites will be developed at the same time, some will be dependent on the BLE being approved and delivered, and that some sites will come forward later in the plan period. This mechanism could, for example include phasing the release of currently protected industrial land, use of Grampian Conditions, and bringing forward sites closest to potential stations first.

This mechanism will require effective monitoring and will need to be agreed by Southwark, the GLA and TfL. TfL may also wish to be a signatory to any S106 agreements to ensure this phasing.

The document should also outline the open space and social infrastructure necessary to support up to 20,000 new homes and 10,000 new jobs.

As a general comment, it is expected that reference be made in all site allocations to

The phasing and delivery section of the Old Kent Road vision now addressed this.

Non-designated industrial sites are covered by Policy P29 (office and business development) regarding re-provision of employment (B class) uses where they are located in the opportunity areas, town centres or it is specified in a site allocation. Policy P29 requires a marketing strategy to be provided for the use and occupation of the employment floorspace to be delivered to demonstrate how it will meet market demand. Therefore planning applications must ensure the delivery of employment space is suitable to the local market and meeting demand. This means we would encourage a range of workspaces to suit demand in different parts of the borough. We are currently working on the types of affordable workspace that are in demand across different parts of Southwark to better inform developers.

Emerging London Plan policy does not require no net loss of industrial floorspace capacity on non-designated sites. However the New Southwark Plan offers stronger protection to ensure no net loss of employment floorspace capacity which meets market demand.

The emerging draft London Plan Policy E7 Part D states that mixed use or residential development proposals on Non-Designated Industrial Sites should be supported where either:

- 1) There is no reasonable prospect of the site being used for industrial purposes; or
- 2) **It has been allocated in an adopted development plan document for residential or mixed-use development;** or
- 3) Industrial, storage or distribution floorspace is

specific B Use Classes (B1c, B2, B8) and not just "B Class" as is the case in of all site allocations within the document and especially for sites in the OKR. As explained above, this is to prevent the potential loss of all industrial activity on sites.

provided as part of mixed-use intensification.

The council has taken measures to ensure the continuation of business uses on non-designated industrial sites. All currently adopted preferred industrial locations and proposed or adopted site allocations containing industrial land are protected by an Article 4 Direction which restricts the permitted development change of B1c (light industrial uses) to residential. Additionally all railway arches in B1a, B1c or B8 uses benefit from an Article 4 Direction restricting the change of use to residential.

Organisation: Greenspruce GP
NSPPSV72.1

Greenspruce is the registered proprietor of the long leasehold interest in 107 Dunton Road, London, SE1 5HG (the "Site"), such leasehold interest having approximately 992.5 years unexpired. The Site is a 2.2 hectare site located on the Old Kent Road currently comprising a Tesco Superstore and petrol filling station, with surface-level parking. The Site is leased to Tesco Stores Limited.

The existing Tesco Superstore employs approximately 250 people and provides a key service to existing and future residents. It is also an important and valuable asset which is owned by Greenspruce as part of long term investment strategy. This Site comprises part of an identified 4.1 hectare Site Allocation in the draft New Southwark Plan: NSP58: 107 Dunton Road (Tesco store and car park), Southernwood Retail Park. The Southernwood Retail Park, separated from the Site by Humphrey Street, lies outside of our client's ownership.

Further detail is provided in the detailed Site Allocation set out in the draft Old Kent Road Area Action Plan (Allocation OKR4). Representations will be submitted in due course in respect of the draft Old Kent Road AAP, in advance of the deadline of 21 March.

Support noted.

The Site has also been identified by Transport for London ("TfL") as potentially being a location for a new underground station and entrance as part of the proposed Bakerloo Line Extension ("BLE")

The context for these submitted observations and suggestions is our client's freehold ownership of an identified, strategic development opportunity, potentially capable of supporting a significant number of new homes, transport infrastructure, large-scale replacement and additional retail provision, commercial floorspace, and enhanced public realm. Our client's site represents one of the most strategic development opportunities within the Old Kent Road Opportunity Area and Area Action Plan area. Policies should fully support intensification and strategic growth, including tall buildings upon the Site, both with or without the delivery of the BLE.

Greenspruce GP Limited advised by Invesco Asset Management, are fully supportive of the strategic policies of the draft New Southwark Plan and it is clear that the Site will play a critical role in delivering these strategic objectives in the context of the long-term regeneration and intensification of the Old Kent Road. Delivering new homes, jobs, well-designed public spaces and places that will improve the quality of life and reduce inequality for existing, as well as future, Southwark residents are inherently laudable aims and will form the heart of any future redevelopment of the Site. The representations are made in this letter relating to specific policy wording of relevance to the strategic development aspirations for the Site.

...

Conclusion

Greenspruce GP Limited advised by Invesco Asset Management, support the strategic aspirations of the emerging New Southwark Plan and welcome this opportunity to provide observations and suggestions in respect of refining the emerging policies to optimise the potential for unlocking the regeneration of the Old Kent Road.

Organisation: Helix International Group
NSPPSV80.2

Support noted.

<p>The overarching principle of the vision is welcomed and supported. The aspiration to provide new homes, jobs and a revitalised high street and town centre in a sustainable and sensitive manner with regard to existing residents and companies is particularly supported.</p> <p>The site, 328 St James’s Road, offers an opportunity to contribute towards realising the aspirations, aims and objectives of the New Southwark Plan, including the Vision for the Old Kent Road Area. The opportunity of the site is represented in its potential for high quality mixed use redevelopment.</p>	
<p>Organisation: Indigo Planning NSPPSV88.2</p> <p>Policy AV.12.2 Development in Old Kent Road Policy AV.12.2 (fifth bullet point) sets out that development in Old Kent Road should ‘build new homes that come in a range of types from terraced houses to apartments with a high design quality...’. In order for this statement within the plan to link with the remainder of the plan and with the emerging Old Kent Road Area Action Plan, this statement should be amended to reference the delivery of student accommodation as part of development in Old Kent Road. We note that the Council refers to student accommodation as part of the overall housing supply¹ so in order to make the intent for development in Old Kent Road clear, student accommodation should be specifically referenced.</p>	<p>Representation noted.</p> <p>Given the identified need for housing, social rented and intermediate housing and family housing in the borough, this is a focus of the plan and the area visions.</p>
<p>Organisation: LB Lewisham NSPPSV106.3</p> <p>I set out below officer level comments from the London Borough of Lewisham:</p> <p>In relation to the Bakerloo Line Extension:</p>	<p>Support noted.</p> <p>The Old Kent Road vision now states development will be phased based on the commitment and delivery of the Bakerloo Line extension. It is anticipated around 9,500 homes will be committed in Phase 1 (2018-2023) alongside enhancements to the existing</p>

1 Your Plan supports the Bakerloo Line Extension (BLE) and recognises the development potential associated with this strategic piece of infrastructure, especially within policies P51 Transport Infrastructure Improvements and AV.12 Old Kent Road Area Vision. We also strongly support the commitment given to Phase 1 of the BLE to serve Old Kent Road, New Cross Gate and Lewisham and see it as a prerequisite to improve transport connectivity, increase the capacity and resilience of the transport network, reduce journey times, enhance PTAL levels and increase the share of journeys made by foot, cycle or public transport. It will also provide opportunities to unlock development potential by supporting new jobs and homes in these locations. Overall, we feel that the BLE has the ability to transform both of our Boroughs and we look forward to continuing to work with you on this important strategic cross-boundary issue.

2 We feel strongly that your Plan would benefit by acknowledging “the need for joint funding and partnership working with key bodies such as the GLA, TfL and the London Borough of Lewisham in order to ensure timely delivery of the BLE, as proposed by the Mayor of London, and to work towards a clear and transparent agenda in terms of safeguarding the BLE route and delivering associated infrastructure and development sites alongside the BLE”.

3 We are also seeking greater certainty from the Mayor of London with a funding commitment to BLE Phase 2, as this will be crucial to unlocking more development opportunities to the south of Catford and within the wider South East area.

4 We welcome the specific reference in paragraphs 2.13, 2.18, 3.26 and 3.35 of your Duty to Cooperate Statement, to our joint work on the Bakerloo Line Extension and surrounding areas including Old Kent Road, Bermondsey Trading Estate, Bermondsey Diver Under and New Cross masterplan.

5 We note further details are set out in the Old Kent Road Area Action Plan / Opportunity Area Planning Framework, and if necessary we will comment on this separately in due course, prior to the end of consultation on 21st March 2018.

Individual

public transport network prior to the confirmation of the Transport and Works Act Order for Bakerloo Line extension. The remaining 10,500 will be committed for Phase 2 (2023-2027) and will be subject to agreement between Southwark Council, the Greater London Authority and Transport for London relating to the status of transport improvements. A detailed phasing plan is included in the New Southwark Plan Infrastructure Plan and in the Old Kent Road Area Action Plan.

It acknowledges that an agreement will be required between Southwark Council, the Greater London Authority and Transport for London, this includes funding.

OLD KENT ROAD ALL SITE ALLOCATIONS 55- 74

The site visions and uses are unsound because they fail to meet evidenced need and/or lack conformity with new London Plan policy. To be sound they should be amended as follows:

- All sites that include industrial land as an existing use, whether designated or non-designated, should retain industrial use at least as part of mixed use development
- When referring to new homes, a significant proportion should be social rented housing.
- Where retail is provided, a proportion of these should be replacement units for traders who have been relocated
- Where open space is referred to, this should be described as green space unless there will be hard standing, in which this should be open and transparent
- All sites should include small business space.
- All sites should include community facilities.

Representation noted.

Our evidence base recommends the protection and support of employment floorspace and this is reflected in the requirements in Policy P28 (Strategic Protected Industrial Land) and the site allocations where we expect to see re-provision of floorspace at least and growth in some areas to generate jobs. Policy P30 (affordable workspace) also adds a further layer of protection for small and independent businesses and requires the full consideration of the feasibility of providing affordable and suitable space for existing occupiers in the completed development.

Policy SP1 (quality affordable homes) clarifies that the aspirational target for the borough is 50% social rented and intermediate housing. This will be achieved through a higher provision of social rented and intermediate housing on council owned land. This commitment is set out on page 12 (A Fairer Future - a place to belong) of the Council Plan. We will continue our long-term homebuilding programme, delivering on our commitment to build 11,000 new council homes by 2043. Under development management policy P1 (social rented and intermediate homes), all developed sites across the borough must provide a minimum of 35% social rented and intermediate housing of which 25% of this is required as social rented homes. Where possible, this figure will be exceeded, and all developers will be required to release their viability calculation for public scrutiny.

Policy P31 (small shops) requires developments to retain small shops and where they are at risk of displacement from a development, full consideration of the feasibility of providing affordable and suitable space for existing occupiers in the completed development is required.

We encourage sites to deliver open space as green spaces with parks and playspace facilities where appropriate. This will be determined and delivered on a site by site basis in accordance with the specific scheme designs.

Policy P30 (affordable workspaces) seeks the retention of small and independent businesses. Where existing small and independent businesses are at risk of displacement from development there should be full consideration of the feasibility of providing affordable and suitable space for existing occupiers in the completed development. It also sets the requirement for affordable workspace on sites proposing 500sqm GIA or more employment floorspace (B class use). This could include small business spaces.

Policy P44 (community uses) encourages community uses, it also states that development should retain community facilities (this will only not stand in exceptional cases where evidence has been provided that the community space is no longer required).

Organisation: TfL City Planning
NSPPSV181.23

TfL will be providing detailed comments on the latest version of the Old Kent Road Area Action Plan. However it is of course vital that the NSP and AAP are broadly aligned. As such, a summary of TfL's position is given below:

1) The case for the Bakerloo line extension (BLE) is dependent to a significant degree on the extent to which the scheme can be shown to unlock new homes and jobs (not vice versa) and the scheme is required to support 'good growth' and thus be in conformity with the London Plan. This must be made very clear in policy.

Representation noted. The vision states development will be phased based on the commitment and delivery of the Bakerloo Line extension. It is anticipated around 9,500 homes will be committed in Phase 1 (2018-2023) alongside enhancements to the existing public transport network prior to the confirmation of the Transport and Works Act Order for Bakerloo Line extension. The remaining 10,500 will be committed for Phase 2 (2023-2027) and will be subject to agreement between Southwark Council, the Greater London Authority and Transport for London relating to the status of transport improvements. A detailed phasing plan is included in the New Southwark Plan Infrastructure Plan and in the Old Kent Road Area Action Plan.

2) There must be a clear cap on development until there is a level of certainty over delivery of the BLE. Without this, there is no certainty that 'good growth' can occur. The absence of an effective mechanism for phasing development would thus undermine confidence that the BLE can be delivered, and thus undermine developer confidence in the area as a whole.

3) Funding must be recognised as an issue. To not do so would further undermine confidence in the area as it would suggest that a/the key issue has not been recognised. The document should also set the context for the principle that the high level of development envisaged that can only come forward with the BLE (as recognised in point 2) and must provide a source of funding for it.

4) There must be a clear mechanism to show how the cap will be applied (and released), linked to existing policy designations. In effect this therefore has to link to the release of Protected Industrial Land (both Strategic and Local) as identified in the current local plan and in terms of the former as SIL in the London Plan. This has the benefit of allowing a suitable level of development prior to more certainty on the BLE's delivery (c6-10k new homes), providing a suitable spread along the length of the OKR and maintaining consistency with the London Plan.

5) The phased release of PIL and subsequent delivery of development must then be clearly linked to certainty around the BLE. Aside from the planning benefits / necessity, this approach would also serve to increase values for housing delivery which would then improve the funding case for the BLE.

It is therefore suggested that the fundamental principle of phasing development in advance of the BLE and of development contributing towards the funding of the scheme is reflected, in summary form, in 'AV.12.3 Growth opportunities in Old Kent Road'. Also, there should be a sentence that explains that not all the sites listed will be able to be developed immediately, and that some will, for the full vision, be dependent on BLE delivery ie later in the plan period.

AV.12.2 should also mention the need for development to support improvements to

Policy SP5 (healthy, active lives) encourages healthy streets. P12 (design of places) also sets out the requirements for the design of developments and requires buildings and public spaces and routes to be positioned according to their function, importance and use.

'Electric buses' has been amended to 'cleaner buses'.

Policy P52 (cycling) sets out that development must contribute towards the provision of cycle hire schemes and this may also include providing space within the development for the expansion of the cycle hire scheme.

Old Kent Road itself, in line with the 'HealthyStreets Approach'. This could include land 'set back' in appropriate sites fronting Old Kent Road, so it would be helpful if this was also stated explicitly. Similarly, it could specifically mention that development should minimise impacts on Old Kent Road, and the wider OA more generally, in terms of deliveries and servicing.

The second bullet point in AV 12.2 mentions 'electric buses'. This could most usefully be changed to 'cleaner' buses, in order not to be too specific, for example TfL also has hydrogen buses that can be classed as 'zero emission'

The second bullet point in AV 12.2 could mention specifically the need for development to support expansion of cycle hire to the area

Organisation: Thames Water Utilities Ltd
NSPPSV184.4

The regeneration of the Old Kent Road Opportunity Area will result in a significant increase in potable demand and wastewater discharge putting significant stress on already constrained water supply and sewerage infrastructure serving the areas of proposed redevelopment.

The evidence base for the Local Plan and the emerging Old Kent Road Area Action Plan should include the Old Kent Road Integrated Water Management Strategy. Both documents should aim to secure the recommendations of this strategy which is being prepared by AECOM in association with the London Borough of Southwark, the GLA, the EA and Thames Water. The document was commissioned to set a framework for understanding, planning and delivering water services and flood risk management infrastructure to support the proposed development within the Old Kent Road Opportunity Area.

Site Specific Comments

In relation to the proposed site allocations, the information available at this time makes detailed assessments of the impacts on water and wastewater difficult. However, comments based on the information currently available are appended.

Any developers are advised to contact Thames Water Developer Services as early as

Representation noted. Applicants of major developments will be advised to consult Thames Waters' free pre-application advice at the earliest stage.

possible to discuss the infrastructure requirements for the site. Thames Water Developer Services can be contacted by post at:
I trust the above and enclosed comments are satisfactory, but please do not hesitate to contact me if you have any queries.
Yours sincerely,

Organisation: Thames Water Utilities Ltd
NSPPSV184.90

The Old Kent Road Integrated Water Management Plan has been prepared by AECOM in association with the London Borough of Southwark, the GLA and Thames Water. The document should be included as part of the evidence base for both the Local Plan and the Old Kent Road Area Action Plan with the policies in both documents worded to help ensure that opportunities for integrated water management are delivered. The absence of reference to the document is considered to make the document unsound.

Under section AV.12.2 an additional bullet point should be added as set out below. This would ensure that reference is made to the evidence base and that opportunities for delivery of integrated water management are explored. Development in Old Kent Road should:

- Demonstrate that opportunities to deliver on the recommendations of the Old Kent Road Integrated Water Management Strategy have been incorporated into proposals. Where opportunities are not taken developers will be required to demonstrate clear justification for their approach.

Additional supporting text should also be added to state:
Developers of proposals within the Old Kent Road Area will be expected to demonstrate that they have actively liaised with the Thames Water and the London Borough of Southwark to identify opportunities of delivering on the recommendations of the Old Kent Road IWMS.

Organisation: 313-349 Ilderton Road LLP
NSPPSV217.11

The Old Kent Road Integrated Waste Management Plan forms part of the evidence base for the New Southwark Plan and the Old Kent Road Area Action Plan.

It is not necessary to reference the document within the vision. Applicants of major developments will be advised to consult Thames Waters' free pre-application advice at the earliest stage.

Representation noted.

Old Kent Road Area Vision Map allocates the subject site within the southern portion of 'NSP70 Ilderton Road' with the visions setting out criteria for development within Old Kent Road including:

- Deliver direct benefits to the existing community including new and improved homes including new council homes, schools, parks, leisure and health centres, and the creation of wide range of jobs;
 - Promote car free development and support the Bakerloo Line extension, electric buses, taxis, commercial vehicles and cycling which will help to tackle air and noise pollution, vital for the health of all but particularly the health of children;
 - Help foster a community in which old and young can flourish. Building nursery schools together with older people's accommodation has had great success in other cities in reducing loneliness and social isolation. There will be opportunities to connect schools and further and higher education institutions with local employers to make the most of the diverse employment opportunities that exist in the Old Kent Road;
 - Help grow the significant economic base in the Old Kent Road, not just for offices, but over a wide range of skills and job types, including the types of business that service Central London such as the distribution industry and new and growing sectors such as the arts industry. This includes promoting innovative ways of mixing homes with commercial uses and making the best use of space which, done with care, will deliver a place that is desirable to live and work in;
 - Build new homes that come in a range of types from terraced houses to apartments with a high design quality including generous room sizes, high ceilings and big windows to ensure people have space to think and to rest;
 - Link existing open spaces like Burgess Park to each other and new park spaces to provide a "Greener Belt" network accommodating play, sports, growing spaces, nature and places to just sit and contemplate;
 - The ambition is to create an environment that delights the senses. There will be new neighbourhoods that promote physical activity, social interaction and shield from pollution and feeling unsafe;
- Continuation Sheet
- Demonstrate excellent standards of environmental sustainability including pioneering new district heating networks to reduce carbon emissions, measures to tackle poor air

<p>quality and sustainable urban drainage systems to reduce flood risk. We support the vision set out within the NSP particularly in respect of delivering comprehensive new mixed-use developments comprising both homes (Use Class C3) and new employment floorspace (Use Class B).</p>	
<p>Individual NSPPSV287.3</p> <p>Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? - Legally compliant No</p> <p>Do you consider that the New Southwark Plan is sound? - Soundness No</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: - Do you consider that the New Southwark Plan is unsound because it is not: Justified</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: - Do you consider that the New Southwark Plan is unsound because it is not: Effective</p>	<p>Representation noted. Insufficient information for full response.</p>
<p>Individual NSPPSV316.2</p> <p>Positively Prepared Not compliant with NPPF</p> <p>No comment applied.</p>	<p>Representation noted. Insufficient information for full response.</p>

Individual
NSPPSV317.3

Justified
Not legally compliant
No further comment applied

Representation noted. Insufficient information for full response.