

Representation	Officer Comments
<p data-bbox="185 317 477 349">Aylesbury Area Vision</p> <p data-bbox="185 357 331 424">Individual NSPPSV337</p> <p data-bbox="185 467 1433 603">It is written in the foreword, “we need more affordable homes and in particular new council homes”, however the AV.x Aylesbury Area Vision (AAV) section states an objective of “delivering 50% affordable housing”. This does not engage with the particular need, as outlined earlier in the document, for council housing; it also does not ensure no net loss of affordable housing.</p> <p data-bbox="185 646 1422 746">Southwark Council changed their consultation procedure midway through the process, and this is not lawful. The AAV map has also been modified midway during the consultation cycle; this warrants a new consultation, rather than the continuation of an ongoing one.</p> <p data-bbox="185 790 1458 999">The AAV is, in many places, ambiguously phrased and unclear. The use of the term ‘brownfield land’ to describe the Aylesbury and surrounding council estates is a poor descriptor and does not acknowledge current residents. Additionally, the ‘Aylesbury area’ is never explicitly defined, leading to ambiguity in passages such as "...replacing all the existing social rented homes in and in reasonable proximity to the original footprint of the estate". There is concern that this paragraph refers to the redevelopment of areas beyond the adopted AAAP Boundary Plan.</p> <p data-bbox="185 1042 1458 1142">Finally, there is no robust or credible evidence base to support the demolition or redevelopment of homes surrounding the Aylesbury Estate. There has not been consultation on this option or any alternative options.</p> <p data-bbox="185 1185 1397 1252">Therefore, this part of the NSP is not positively prepared, is unjustified, unsound and ineffective. This section should be deleted.</p>	<p data-bbox="1485 357 2047 675">The Aylesbury Area Action Plan and the New Southwark Plan set a requirement to deliver 50% social rented and intermediate homes in the Action Area (except in AAAP1 and AAAP4). The area is going through estate regeneration to reprovide the homes that have been demolished. A 50% social rented and intermediate homes requirement will ensure that the affordable homes are reprovided.</p> <p data-bbox="1485 718 2040 962">There is a Council Plan commitment that commits us to guarantee developments on council housing land have at least 50% council rented homes and ensure a right to return for council tenants and resident leaseholders so local people can stay in the borough they call home.</p> <p data-bbox="1485 1005 2047 1179">The Aylesbury map in the NSP was changed to reflect the existing Area Action Plan boundary to ensure the map was accurate and therefore additional public consultation was not required.</p> <p data-bbox="1485 1222 2018 1396">Reference to brownfield land has been removed. The ‘Aylesbury area’ is defined in the vision map and refers to the Aylesbury Area Action Plan boundary, this has been amended in the vision.</p>

Aylesbury Area Vision states: “The Aylesbury area is characterised by large concrete slab buildings, built in the mid 1960s - 70s, now at the end of their service life”. This statement is factually wrong, as the award-winning examples shown and described here prove. In light of these award winning refurbishment schemes, the Aylesbury Area Vision is unsound as it has not been positively prepared, it is not justified, and it is not effective.

1. The 2019 winner of the EU Mies van der Rohe architecture award: social housing refurbishment of three 1960s housing blocks in Bordeaux. Available to view here: <https://miesarch.com/work/3889>
2. The 2017 winner of this prestigious architecture award was the refurbishment of other large 1960s social housing blocks, in Amsterdam. Available to view here: <https://miesarch.com/work/3509>

The Lack of Vision in the existing Aylesbury Area Plan has resulted in one of the most destructive schemes ever proposed and being carried out in the United Kingdom, and it may even be the most destructive. It is not an exaggeration to say that it is an abusive scheme: it has been abusing people destructively. It is not an exaggeration to say that it is an abusive scheme: it has been abusing people—most notably current leaseholders, and it abuses our public realm – specifically Burgess Park and Liverpool Grove Conservation Area:

Notable disadvantages of the new Vision are:

1. the permanent loss of 778 homes for social rent;
2. the permanent loss of 237 affordable homes;
3. the eviction of 778 families/households from their homes and off the Estate where they live, with no right to return – because there will be 778 fewer homes for social rent on the regenerated Estate;
4. the forced eviction of Leaseholders from the homes they own, by Compulsory Purchase Orders (CPOs), with no offer of like-for-like replacement of their homes in the same area, on the same terms, so that their circumstances are not downgraded, and they can remain part of the community where they live;
5. the permanent harm being caused to Burgess Park with its serious and severe loss of public amenity

As acknowledged in the Aylesbury Area Action Plan, following studying the structural condition of the estate, the quality of the environment and the costs of refurbishment, we concluded that it would cost too much to bring the homes up to the decent homes standards. Therefore it was decided that the best way forward was to demolish the buildings and build a better place which would be much more attractive for people to live and work in. The redevelopment strategy for the estate was agreed in 2005.

The redevelopment has taken time and residents have had the opportunity to comment on the proposals throughout the process.

The Aylesbury Area Action Plan and the New Southwark Plan set a requirement to deliver 50% social rented and intermediate homes in the Action Area (except in AAAP1 and AAAP4). The area is going through estate regeneration to re-provide the homes that have been demolished. A 50% social rented and intermediate homes requirement will ensure that the affordable homes are re-provided.

There is a Council Plan commitment that commits us to guarantee developments on council housing land have at least 50% council

due to seven proposed towers more than 10 stories tall, and some up to 20 storeys along Albany Road, overlooking the park;

6. the permanent harm being caused to Liverpool Grove Conservation Area by the 15 storey tower on Plot 18, directly in conflict with the Aylesbury Area Action Plan – both text and Masterplan map; directly in conflict with the existing street pattern; and directly in conflict with the Council's own Policies for the protection of Conservation Areas, specifically Core Strategy Strategic Policy 12 – Design and conservation, Policy 3.15 – Conservation of the Historic Environment, and Policy 3.18 - Setting of Listed Buildings, Conservation Areas and World Heritage Sites.

The loss of 778 homes for social rent on the Aylesbury Estate – just over one-third of all 2249 homes for social rent on the Estate, is one of the highest losses of homes for social rent in any regeneration project at any time in the history of the United Kingdom. For the many thousands of people waiting on Southwark Council's Housing Waiting List, the loss of nearly 800 homes for social rent in the Borough is catastrophic.

The proposed Aylesbury New Area Vision doesn't mention the proposed Strategic Policy SP2 Regeneration that works for all and explain how Regeneration that works for all will work for all residents on the Aylesbury – both tenants and leaseholders, including everyone being evicted from their homes.

Turning around one of the most destructive schemes ever proposed and being carried out in the United Kingdom, requires, at a minimum, a clear, accurate, precise and truthful description of the current circumstances. If the current circumstances were satisfactory, there would be no need for a New Area Vision. As the New Area Vision doesn't clarify what is wrong with the existing Aylesbury Area Vision, it means the proposed Aylesbury New Area Vision is unsound, it has not been positively prepared, it is not justified, and it is not effective.

The scheme currently proposed for Aylesbury Plot 18 – the location of the 'hub' - directly contradicts both the words and map of the Masterplan in the Aylesbury Area Action Plan 2010. The 'Vision' is therefore unsound as it has not been positively prepared, it is not justified, and it is not effective. It is not a Vision – rather it is a nightmare for Aylesbury Road and the Liverpool Grove Conservation Area: a seriously destructive scheme. Southwark council should consider, on at least a small scale, following the example of the winners of the 2019 & 2017 EU Mies van der Rohe architecture awards. If Southwark were to refurbish and renovate a portion of the estate, that would preserve the current diversity of the estate by guaranteeing leaseholders the right to remain within the proposed redevelopment site at no

rented homes and ensure a right to return for council tenants and resident leaseholders so local people can stay in the borough they call home.

disadvantage. The winners of this prestigious prize have proven that it is possible to turn around housing sites earmarked for demolition and make a success of them.

Southwark should offer leaseholders trapped in the regeneration scheme like-for-like replacement of their homes in the same area, on the same terms, so that their circumstances are not downgraded, and they can remain part of the community where they live.

Individual
NSPPSV348

AV.x. 3 Growth opportunities in the Aylesbury Area

While the expressed intention to at least retain existing social rent levels is welcome, this paragraph is poorly phrased, ambiguous and unclear.

To wit;

The use of the term 'brownfield' for the Aylesbury may be technically correct, but it does not acknowledge the presence of current residents and raises the misgiving that they are viewed as an inconvenience to the redevelopment of the estate.

It is not clear whether the 'Aylesbury area' is the area bounded by the adopted AAAP Boundary Plan, or something wider. The 'Aylesbury area' should be explicitly defined or stated to be that of the AAAP Boundary Plan.

The 'existing social rent levels' are much fewer than those of the original estate. A quantified benchmark is needed and this should ensure no net loss of social rented housing ie at least 2,700 homes.

An increase in the amount of housing may or not be desirable depending on the two points above.

There is a particular concern that as this paragraph as phrased it will involve redevelopment of areas or

Reference to brownfield land has been removed. The 'Aylesbury area' is defined in the vision map and refers to the Aylesbury Area Action Plan boundary, this has been amended in the vision.

The Aylesbury Area Action Plan and the New Southwark Plan set a requirement to deliver 50% social rented and intermediate homes in the Action Area (except in AAAP1 and AAAP4) of the approximate 4,200 planned for the Action Area. This 50% may not be all social rented homes due to financing as recognised in the AAP, however, any development will be required to provide 75% social rented homes.

There is a Council Plan commitment that commits us to guarantee developments on council housing land have at least 50% council rented homes and ensure a right to return for council tenants and resident leaseholders so local people can stay in the borough they call home.

estates beyond the adopted AAAP Boundary Plan. This is a possibility that has not been raised during the lengthy NSP consultation period, either generally or with nearby residents and renders this part of the NSP unjustified and unsound.

Individual
NSPPSV349

I am shocked to read in “Aylesbury Area Vision, Policy AV.x. 3 Growth opportunities in the Aylesbury Area” that my home for nearly 30 years is under threat of demolition!! I have not been informed of this? The council not written to all tenants and residents informing them of the consultation so we can properly study the plans, consult with councillors and each other? Instead it seems, rightly or wrongly, that the council is hiding things from its citizens and council tax payers.

I am also shocked that my home and estate is defined as a “Brownfield Site”. In my own research I have come across the following: “Example of brownfield land at a disused gasworks site after excavation, with soil contamination from removed underground storage tanks. In the UK, in urban planning, brownfield land is any previously developed land that is not currently in use, whether contaminated or not. The term is also used to describe land previously used for industrial or commercial purposes with known or suspected pollution including soil contamination due to hazardous waste.”

Having had so little time to read and understand your revised plan (I only learnt of it in recent days) I am

Reference to brownfield land has been removed. The ‘Aylesbury area’ is defined in the vision map and refers to the Aylesbury Area Action Plan boundary, this has been amended in the vision.

The Aylesbury map in the NSP was changed to reflect the existing Area Action Plan boundary to ensure the map was accurate and therefore additional public consultation was not required.

The area vision has been amended to highlight the preference for social rented housing in the Aylesbury Action Area Plan boundary.

leaning on some of the views expressed by local tenant and resident groups. I agree with all of the following taken from emails I have received..

1.

“The New Southwark Plan (NSP) is not legal because Southwark Council changed their consultation procedure mid-way through the consultation process unlawfully. There is a legitimate expectation that this round of consultation should be procedurally identical to previous rounds of consultation. The NSP is not sound because the Aylesbury Area Vision Map has been modified mid-way during the consultation cycle - the first version includes more land to the west of Walworth Road. AV.x.3 Growth Opportunities in the Aylesbury Area: The use of the term "brownfield land" within the Aylesbury area is ambiguous and unsound - Council estates are not "brownfield land" and should not be treated as such.

In the phrase "...replacing all the existing social rented homes in and in reasonable proximity to the original footprint of the estate" it is not clear whether the 'Aylesbury area' is the area bounded by the adopted AAAP boundary Plan, or something wider. The 'Aylesbury area' should be explicitly defined or stated to be that of the AAAP Boundary Plan. There is particular concern that this paragraph, as phrased, will involve redevelopment of areas or estates beyond the adopted AAAP Boundary Plan. This is a possibility that has not been raised during the NSP consultation period, either generally or with nearby residents, including residents of the Rodney Estate, the Alvey Estate, or the Kinglake Estate. The NSP in this section is not justified. There is no robust and credible evidence base to support the demolition or redevelopment of council homes surrounding the Aylesbury Estate. There has been no consultation on this option or any alternative option.

2.

“Draft text in NSP states:

“The Area Action Plan 2010 envisaged approximately 4,200 new homes with the provision of 50% affordable housing. The emerging direction of travel of planning policy seeks to optimise the potential of brownfield land. This suggests that it would now be appropriate to consider an increased number of homes for the Aylesbury area, with a view to moving towards replacing all the existing social rented homes in and in reasonable proximity to the original footprint of the estate. Irrespective of density, the objective of delivering 50% affordable housing should be met.”

However, this section is poorly phrased, ambiguous and unclear.

Council estates are not “brownfield land”. The use of the term “brownfield land” is pejorative, not

There is a Council Plan commitment that commits us to guarantee developments on council housing land have at least 50% council rented homes and ensure a right to return for council tenants and resident leaseholders so local people can stay in the borough they call home.

descriptive. To make a relevant comparison, streets of privately-owned terraced houses in Dulwich, for example, would not be termed as “brownfield land”. The use of the term “brownfield” for the Aylesbury and adjacent council estates does not acknowledge the presence of current residents, undermines our right to occupy the land and makes the demolition of our homes more palatable to policy makers, and therefore more likely.

It is not clear whether the “Aylesbury area” is the area bounded by the adopted AAAP Boundary Plan, or something wider.

The “Aylesbury area” should be explicitly defined or stated to be that of the AAAP Boundary Plan. We are concerned that as this paragraph as phrased it will involve redevelopment of areas or estates beyond the adopted AAAP Boundary Plan. This is a possibility that has not been raised during the lengthy NSP consultation period, either generally or with nearby residents, including residents of the Rodney Estate, the Alvey Estate or the Kinglake Estate.

The NSP in this section has not been positively prepared.

The objectively assessed need for social rented housing in this area has not been sustainably met. There is no assessment of the sustainability of demolition of existing council homes on surrounding estates.

The NSP in this section is not justified.

There is no robust and credible evidence base to support the demolition or redevelopment of council homes surrounding the Aylesbury Estate. There has been no consultation on this option or any alternative option.

The NSP in this section is not effective.

The Plan for the provision of further social rented homes on so-called “brownfield land” is not clear or robust. The Plan is confusing and could have at least two different meanings. Either it could mean that all the Aylesbury homes could be delivered on the surrounding estates, or the homes on the surrounding estates could be demolished and new homes could be delivered there. This makes the Plan in this section unachievable.

Therefore, this part of the NSP is not positively prepared, is unjustified, unsound and ineffective.

This section should be deleted. “

Individual
NSPPSV350

The New Southwark Plan is not legal because Southwark changed their consultation procedure mid-way through unlawfully. The Aylesbury Area Vision Map has been modified mid-way during the consultation cycle, the first version includes more land to the west of Walworth Road. This is a clear pointer to unsoundness. Policy AV.x.3 Growth opportunities in the Aylesbury Area Draft text in NSP states: "The Area Action Plan 2010 envisaged approximately 4,200 new homes with the provision of 50% affordable housing. The emerging direction of travel of planning policy seeks to optimise the potential of brownfield land. This suggests that it would now be appropriate to consider an increased number of homes for the Aylesbury area, with a view to moving towards replacing all the existing social rented homes in and in reasonable proximity to the original footprint of the estate. Irrespective of density, the objective of delivering 50% affordable housing should be met." I strongly support the provision of more social rented homes. I believe that the Council should commit in the NSP to providing COUNCIL HOMES, not just "social rented homes", and that there should be like for like replacement of all Aylesbury council homes with council homes for rent. However, this section is poorly phrased, ambiguous and unclear. Council estates are not "brownfield land". The use of the term "brownfield land" is pejorative, not descriptive. To make a relevant comparison, streets of privately-owned terraced houses in Dulwich, for example, would not be termed as "brownfield land". The use of the term "brownfield" for the Aylesbury and adjacent council estates does not acknowledge the presence of current residents, undermines their right to occupy the land and makes the demolition of their homes more palatable to policy makers, and therefore more likely. It is not clear whether the "Aylesbury area" is the area bounded by the adopted AAAP Boundary Plan, or something wider. The "Aylesbury area" should be explicitly defined, or stated to be that of the AAAP Boundary Plan. I am concerned that the way this paragraph is phrased means it will involve redevelopment of areas or estates beyond the adopted AAAP Boundary Plan. This is a possibility that has not been raised during the lengthy NSP consultation period, either generally or with nearby residents, including residents of the Rodney Estate, the Alvey Estate and the Kinglake Estate. The NSP in this section has not been positively prepared. The objectively assessed need for social rented housing in this area has not been sustainably met. There is no assessment of the sustainability of demolition of existing council homes on surrounding estates. The NSP in this section is not justified. There is no robust and credible evidence base to support the demolition or redevelopment of council homes surrounding the Aylesbury

The Aylesbury map in the NSP was changed to reflect the existing Area Action Plan boundary to ensure the map was accurate and therefore additional public consultation was not required.

Reference to brownfield land has been removed. The 'Aylesbury area' is defined in the vision map and refers to the Aylesbury Area Action Plan boundary, this has been amended in the vision.

The area vision has been amended to highlight the preference for social rented housing in the Aylesbury Action Area Plan boundary.

As acknowledged in the Aylesbury Area Action Plan, following studying the structural condition of the estate, the quality of the environment and the costs of refurbishment, we concluded that it would cost too much to bring the homes up to the decent homes standards. Therefore it was decided that the best way forward was to demolish the buildings and build a better place which would be much more attractive for people to live and work in. The redevelopment strategy for the estate was agreed in 2005.

Estate. There has been no consultation on this option or any alternative option. The NSP in this section is not effective. The Plan for the provision of further social rented homes on so-called "brownfield land" is not clear or robust. The Plan is confusing and could have at least two different meanings. Either it could mean that all the Aylesbury homes could be delivered on the surrounding estates, or the homes on the surrounding estates could be demolished and new homes could be delivered there. This makes the Plan in this section unachievable. Therefore, this part of the NSP is not positively prepared, is unjustified, unsound and ineffective. This section should be deleted.

The redevelopment has taken time and residents have had the opportunity to comment on the proposals throughout the process.

Individual
NSPPSV57

With reference to comment 'To unlock further delivery of social housing the plan includes an Aylesbury Area Vision reflecting a strengthened adopted Aylesbury Area Action Plan' - we know of no changes or consultation on changes to the Aylesbury AAAP, to strengthen it or otherwise. If Southwark intends to change the AAAP it should say so clearly. Please see our further comment on this below, 'Aylesbury Area Vision'.

The vision in the New Southwark Plan sits alongside the Area Action Plan.

The New Southwark Plan is not legal because Southwark changed their consultation procedure mid-way through unlawfully.

The Aylesbury map in the NSP was changed to reflect the existing Area Action Plan boundary to ensure the map was accurate and therefore additional public consultation was not required.

The Aylesbury Area Vision Map has been modified mid-way during the consultation cycle, the first version includes more land to the west of Walworth Road. This is a clear pointer to unsoundness.

The 'Aylesbury area' is defined in the vision map and refers to the Aylesbury Area Action Plan boundary, this has been amended in the vision.

Policy AV.x. 3 Growth opportunities in the Aylesbury Area
Draft text in NSP states:

"The Area Action Plan 2010 envisaged approximately 4,200 new homes with the provision of 50% affordable housing. The emerging direction of travel of planning policy seeks to optimise the potential of brownfield land. This suggests that it would now be appropriate to consider an increased number of homes for the Aylesbury area, with a view to moving towards replacing all the existing social rented homes in and in reasonable proximity to the original footprint of the estate. Irrespective of density, the objective of delivering 50% affordable housing should be met." I strongly support the provision of more social rented homes. I believe that the Council should commit in the NSP to providing COUNCIL HOMES, not just "social rented homes", and that there should be like for like replacement of all Aylesbury council

Reference to brownfield land has been removed.

As acknowledged in the Aylesbury Area Action Plan, following studying the structural condition of the estate, the quality of the environment and the costs of refurbishment,

homes with council homes for rent.

However, this section is poorly phrased, ambiguous and unclear.

AV.x. 3 Growth opportunities in the Aylesbury Area While the expressed intention to at least retain existing social rent levels is welcome, this paragraph is poorly phrased, ambiguous and unclear. To wit; The use of the term 'brownfield' for the Aylesbury may be technically correct, but it does not acknowledge the presence of current residents and raises the misgiving that they are viewed as an inconvenience to the redevelopment of the estate. It is not clear whether the 'Aylesbury area' is the area bounded by the adopted AAAP Boundary Plan, or something wider. The 'Aylesbury area' should be explicitly defined or stated to be that of the AAAP Boundary Plan. The 'existing social rent levels' are much fewer than those of the original estate. A quantified benchmark is needed and this should ensure no net loss of social rented housing i.e. at least 2,700 homes. An increase in the amount of housing may or not be desirable depending on the two points above. There is a particular concern that as this paragraph as phrased it will involve redevelopment of areas or estates beyond the adopted AAAP Boundary Plan. This is a possibility that has not been raised during the lengthy NSP consultation period, either generally or with nearby residents and renders this part of the NSP unjustified and unsound.

Council estates are not "brownfield land". The use of the term "brownfield land" is pejorative, not descriptive. To make a relevant comparison, streets of privately-owned terraced houses in Dulwich, for example, would not be termed as "brownfield land". The use of the term "brownfield" for the Aylesbury and adjacent council estates does not acknowledge the presence of current residents, undermines their right to occupy the land and makes the demolition of their homes more palatable to policy makers, and therefore more likely.

It is not clear whether the "Aylesbury area" is the area bounded by the adopted AAAP Boundary Plan, or something wider. The "Aylesbury area" should be explicitly defined, or stated to be that of the AAAP Boundary Plan. I am concerned that the way this paragraph is phrased means it will involve redevelopment of areas or estates beyond the adopted AAAP Boundary Plan. This is a possibility that has not been raised during the lengthy NSP consultation period, either generally or with nearby residents, including residents of the Rodney Estate, the Alvey Estate and the Kinglake Estate.

The NSP in this section has not been positively prepared.

The objectively assessed need for social rented housing in this area has not been sustainably met. There is

we concluded that it would cost too much to bring the homes up the decent homes standards. Therefore it was decided that the best way forward was to demolish the buildings and build a better place which would be much more attractive for people to live and work in. The redevelopment strategy for the estate was agreed in 2005.

The redevelopment has taken time and residents have had the opportunity to comment on the proposals throughout the process. The area vision has been amended to highlight the preference for social rented housing in the Aylesbury Action Area Plan boundary.

no assessment of the sustainability of demolition of existing council homes on surrounding estates.

The NSP in this section is not justified.

There is no robust and credible evidence base to support the demolition or redevelopment of council homes surrounding the Aylesbury Estate. There has been no consultation on this option or any alternative option.

The NSP in this section is not effective.

The Plan for the provision of further social rented homes on so-called “brownfield land” is not clear or robust. The Plan is confusing and could have at least two different meanings. Either it could mean that all the Aylesbury homes could be delivered on the surrounding estates, or the homes on the surrounding estates could be demolished and new homes could be delivered there. This makes the Plan in this section unachievable.

Therefore, this part of the NSP is not positively prepared, is unjustified, unsound and ineffective. This section should be deleted.

Individual
NSPPSV355

The Plan is unlawful because it does not comply with the Statement of Community Involvement or the Statement of Representations Procedure

The Plan also fails the test of legal compliance, since it has not been developed in line with Southwark Council’s Statement of Community Involvement or made available in accordance with the Statement of Representations Procedure. The Plan has also been developed on the basis of a number of documents which are out of date.

Failure to comply with the Statement of Community Involvement

Southwark Council is under a legal duty to comply with its Statement of Community Involvement when developing a new Local Plan. There are a number of ways in which Southwark has failed to comply with this duty. First, as mentioned above, there have been no efforts to engage the particular groups identified in Appendix D to the Statement of Community Involvement. In Appendix D Southwark Council identifies a number of methods which it undertakes to use to engage groups which may otherwise face barriers to

Throughout the production of the New Southwark Plan, we have consulted the public in line with legal requirements and given residents the opportunity to comment on the Aylesbury Area Vision within the Amended Policies consultation.

We are in the process of updating our Statement of Community Involvement which will set out how we will consult in plan making and in planning applications. We have also introduced the Development Consultation Charter to hold developers responsible for

taking part in planning consultations. The Council states that it will, among other things:

- seek to provide information and training on planning tailored to the needs of the groups identified in Appendix D,
- use translators and interpreters where appropriate,
- source local knowledge on how to engage the identified groups, ensure that all written information is available in different languages, and
- train council officers in understanding equality, diversity, faith and belief issues.

However, none of the Consultation Reports for any stage of the development of the New Southwark Plan provide any evidence that these methods have been used. There is no reference to Appendix D or the methods listed in the Appendix in the Consultation Reports. In response to a Freedom of Information Request (Reference 884411) made on 30 January 2018 and answered on 23 February 2018 Southwark Council confirmed that it has done nothing in relation to overcoming barriers to consultation faced by particular groups beyond what is mentioned in the Consultation Reports.

The Statement of Community Involvement also provides: “We will promote equality for all and respond to the needs of our many diverse communities. We must consult groups that do not usually get involved. We will monitor consultation exercises for the Equalities Target Groups: age, gender, ethnicity, religion/belief, sexual orientation and disability. We will report this in the consultation statement to the decision maker”. This approach is reflected in the Consultation Plans drafted by the Council. However, when it comes to the Consultation Reports, there is no evidence of any monitoring of consultation exercises for the Equalities Target Groups, apart from some brief analysis in the first Consultation Report which relates only to responses to the “Let’s talk about your high street” consultation conducted in 2013/14 at the very beginning of the development process for the New Southwark Plan.

By failing to engage in any of the specific methods listed in Appendix D or in monitoring and reporting on the engagement of different Equalities Targets Groups in the Consultation Reports, Southwark Council has failed to comply with certain aspects of its Statement of Community Involvement, thus rendering the Plan in breach of section 19(3) of the Planning and Compulsory Purchase Act 2004.

In order to be justified, a Local Plan must be supported by evidence, part of which includes the views of the local community on policies proposed by the local planning authority. A Local Plan will not be justified if it has not involved effective engagement with local individuals and groups. The National Planning Policy Framework also places great emphasis on the importance of consulting the local community in the process of developing and updating Local Plans. For example, it states:

- One of the principles that should underpin plan-making is “empowering local people to shape their

consulting residents on planning applications and ensure they accurately and honestly report on the comments received and how these have been addressed in and shaped the proposed development.

We produced an Equalities Impact Assessment for the Aylesbury Area Action Plan in 2009, we have also prepared an Equalities Impact Assessment as part of the Integrated Impact Assessment for each version of the New Southwark Plan. A standalone Equalities Impact Assessment has been prepared for the Submission version of the New Southwark Plan.

There is a Council Plan commitment that commits us to guarantee developments on council housing land have at least 50% council rented homes and ensure a right to return for council tenants and resident leaseholders so local people can stay in the borough they call home.

surroundings”.

- “Local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see. To support this, local planning authorities should aim to involve all sections of the community in the development of Local Plans and in planning decisions, and should facilitate neighbourhood planning.”
 - “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”
- A number of failings in the consultation process have made it more difficult for interested individuals and community groups to engage effectively in shaping the New Southwark Plan. During consultation on the Proposed Submission Version (“PSV”), these included the consultation deadlines set by the Council and the inaccessibility of the PSV and its accompanying documents. Furthermore, throughout the process of developing the Plan, Southwark Council has failed to provide any evidence that it is monitoring the consultation responses it receives or actively seeking to engage individuals and groups from communities that are typically underrepresented or less engaged in public life.

The Plan does not have any proposals tailored to the benefit of the local community

The community was not consulted like we were in the previous masterplan in preparation for AAAP.

Southwark Council’s attitude towards the local community proves that:

- The plan does not include the interest of the current leaseholders.
- No mention of the leaseholders and no consultation whatsoever with approximately 274 existing leaseholders currently on the estate
- The new area plan has changed without the knowledge of the leaseholders and residents affected
- The community is systematically being displaced due to the council’s new agenda for the estate
- As leaseholders we feel that there is a hidden agenda of social ethnic cleansing
- There is no consideration for the needs of BAME groups affected in the local area and Southwark is categorically failing to carry out its public sector equality duty Fully transparent and independently monitored Equality Impact assessments should be available. Real consultation of equalities target groups must take place, these should be based on age, gender, ethnicity, religion/belief, sexual orientation and disability.

Southwark can be proactive in proving its dedication to mitigating any impact on these protected groups. By using organisations such as The Runnymede trust or Media Diversified as independent reviewers of Southwark's Equality consultation process, we can ensure trust is returned to the community and the needs of these protected groups are publicly taken into consideration.

The new plan should include:

- New youth centres
- Independently monitored guarantees for the protection of ethnic minority leaseholders and other protected groups
- Learning centre
- Mother and toddler support group
- Training centres for the unemployed
- Apprenticeship support group
- Business enterprise centre

Organisation: Southwark Law Centre
NSPPSV167

1. AV.x.1 states: "It [the Aylesbury] originally accommodated 2,750 homes and is characterised by large concrete slab buildings built in the mid 1960s – 70s, now at the end of their service life,..."

Claiming that the buildings are "now at the end of their service life" is inaccurate. Many concrete slab buildings from the same period can be and are being refurbished such as the Ledbury Estate.

2. AV.x.3 states "The emerging direction of travel of planning policy seeks to optimise the potential of brownfield land. This suggests that it would now be appropriate to consider an increased number of homes for the Aylesbury area."

This is an extremely vague statement that implies Southwark's development plan can be influenced by direction of planning policy, without the requirement to provide rigorous evidence of local need and exploration of alternatives. At a minimum, the NSP should justify this statement with references to specific changes in national and strategic policy. Southwark Council already optimised potential of the Aylesbury Estate by increasing provision of residential units from 2750 to 3,575. Raising this to 4200 is arbitrary and is not accompanied with evidence of how it was arrived at. This increase is not justified as

As acknowledged in the Aylesbury Area Action Plan, following studying the structural condition of the estate, the quality of the environment and the costs of refurbishment, we concluded that it would cost too much to bring the homes up the decent homes standards. Therefore it was decided that the best way forward was to demolish the buildings and build a better place which would be much more attractive for people to live and work in. The redevelopment strategy for the estate was agreed in 2005.

The redevelopment has taken time and residents have had the opportunity to comment on the proposals throughout the

other location options for providing homes are not evidenced. The Aylesbury AAP (2010) already sought to optimise the potential of its brownfield land. Increasing density substantially will increase pressure on local infrastructure, including the already at capacity transport network on the Old Kent Road and Walworth Road bus corridor.

3. No evidence of consultation in creating the vision is provided. This is not proportionate.

4. Southwark Council must transparently commit to replacing all the existing social rented homes in the Aylesbury. “[...] with a view to moving towards replacing all the existing social rented homes in and in reasonable proximity to the original footprint of the estate” is ambiguous. A concrete commitment must be included. The inclusion of social rented homes in “reasonable proximity” to the original footprint of the estate is also extremely vague and unjustified. This wording increases the scope of the Area Vision without any explanation.

5. AV.x.2 states “Generate new neighbourhoods with a range of housing tenures that will attract existing residents to stay and new people to move in, including Southwark residents who want to stay and benefit from the great connections, facilities and communities.”

There should be a greater emphasis on existing social rented tenants within this vision and provision for social rented tenants should come first. The housing need is greatest for this group and the Area Vision should mention this explicitly

6. AV.x.2 states development should “Deliver homes and a wider urban environment suitable for residents at all stages in their lives, encouraging people to live and work locally. This will include excellent cycling provision, safe secure streets with good building frontages and a choice of homes including a range of different sized homes, generous space standards and provision of specialist housing.”

The Aylesbury Estate is notable for its excellent mix of 3, 4 and 5 bed family homes, homes which are most needed by those on the social housing waiting list. This mix of larger family sized homes should be replicated in new developments and priority to social housing tenants should be made explicit if Southwark is to address its large housing waiting list.

7. More than one-third of the area included in the proposed Aylesbury Area Vision Map is taken up by

process.

The Aylesbury Area Action Plan and the New Southwark Plan set a requirement to deliver 50% social rented and intermediate homes in the Action Area (except in AAAP1 and AAAP4) of the approximate 4,200 planned for the Action Area. This 50% may not be all social rented homes due to financing as recognised in the AAP, however, any development will be required to provide 75% social rented homes.

There is a Council Plan commitment that commits us to guarantee developments on council housing land have at least 50% council rented homes and ensure a right to return for council tenants and resident leaseholders so local people can stay in the borough they call home.

Policy P2 of the Plan sets out the requirement to provide family homes in proposed developments to ensure we meet the needs of our residents, in particular tenants with a social rented housing need.

As Metropolitan Open Land, development surrounding Burgess park will be guided by policy P56 (open space), so this does not need to be repeated as P56 is an overarching policy covering all open space in the borough.

A number of policies in the Plan seek to

Burgess Park, yet there is not one single Vision proposed for Burgess Park. At a minimum, the proposed Aylesbury Area Vision should recognise that Burgess Park is a major heritage asset, and protected Metropolitan Open Land.

The proposed Aylesbury Area Vision should set out how the regeneration plans will be changed to protect Burgess Park from the inappropriate development currently proposed, in accordance with Southwark Council's legal obligation to protect Burgess Park. The proposed Aylesbury Area Vision doesn't mention their legal obligation to protect Burgess Park as Metropolitan Open Land.

It should add a specific section on vision for the park, including exemplary and sensitive design of buildings to minimise shade and loss of amenity, proportionate building heights in line with the park's shape and further enhancements to children's play provision and sports facilities. A strength of the Aylesbury Area Action Plan (2010) was its Green Fingers to connect Burgess Park with new developments. This additional open green space has been removed from development plans without justification. This adds further pressure to the park.

8. Cycling provision is not referred to strategically in the proposed Aylesbury Area Vision. The vision takes no account of how cycling in London has been transformed in recent years. Far greater provision for cycling should be presented in the Aylesbury Area. There is a particular need to address cycling within Burgess Park following complaints around cyclists posing a threat to vulnerable park users.

1. Remove "now at the end of their service life"

2. Provide rigorous evidence of housing need and exploration of alternatives. Provide evidence on how the 4200 figure was calculated. At a minimum, the NSP should justify brownfield statement with references to specific changes in national and strategic policy and relate this to targets in provision of residential units in the Aylesbury area demonstrating the increase from 2750 to 3,575.

3. Conduct proportionate consultation.

4. Firmly commit to replacing all the existing social rented homes in the Aylesbury. Remove "proximity to the original footprint of the estate." This wording increases the scope of the Area Vision without any explanation.

protect heritage in the borough. This includes Policy P20 (conservation of the historic environment and natural heritage) which sets out that development must conserve and enhance the significance of the following heritage assets and their settings including registered parks.

The vision does acknowledge that development should include excellent cycling provision.

<p>5. Include a greater emphasis on existing social rented tenants within this vision and provision for social rented tenants should come first. The housing need is greatest for this group and the Area Vision should mention this explicitly</p> <p>6. Require the excellent mix of 3, 4 and 5 bed family homes is retained and priority is given to social housing tenants</p> <p>7. Recognise Burgess Park is a major heritage asset, and protected Metropolitan Open Land. Add a specific section on vision for the park, including exemplary and sensitive design of buildings to minimise shade and loss of amenity, proportionate building heights in line with the park's shape and further enhancements to children's play provision and sports facilities.</p> <p>8. Strategic provision for cycling should be presented in the Aylesbury Area.</p>	
<p>Individual NSPPSV357</p> <p>With reference to comment 'To unlock further delivery of social housing the plan includes an Aylesbury Area Vision reflecting a strengthened adopted Aylesbury Area Action Plan' - we know of no changes or consultation on changes to the Aylesbury AAAP, to strengthen it or otherwise. If Southwark intends to change the AAAP it should say so clearly. Please see our further comment on this below, 'Aylesbury Area Vision'.</p>	<p>The vision in the New Southwark Plan sits alongside the Area Action Plan.</p>
<p>Individual NSPPSV362</p> <p>No further comment applied</p>	<p>We are unable to respond to this comment due to a lack of detail.</p>
<p>Organisation: Aylesbury Leaseholders Action Group NSPPSV375</p> <p>I do not consider the NSP AV.x Aylesbury Area Vision to be legal and sound because it does not comply</p>	<p>We have consulted on the Area Vision in the Amended Policies consultation.</p> <p>The vision in the New Southwark Plan sits</p>

with the National Planning Policy Framework and the London Plan or the Mayor's Good Practice Guide to Estate Regeneration (2018).

There has been no consultation with residents, especially T&RAs about this new Area Vision. It was not included in the first NSP consultation in 2017 so there has been no time to properly consult residents. The Mayor's Good Practice Guide to Estate Regeneration (2018) states

" As projects develop and change, and as alternative options are considered with residents, different approaches to consultation and engagement may become appropriate. Councils, housing associations and their partners should always be open to suggestions from residents and other stakeholders about developing more effective consultation and engagement mechanisms."

The council has failed in its duty to consult and engage with residents before making this Area Vision. This is also going against Southwark's Charter of Principles.

The vision is not positively prepared as I do not understand if this vision replaces the whole AAAP or just the vision on pages 19 & 20 and Appendix 4 of the AAAP or whether it is replacing all of the AAAP.

The original AAAP is very clear and concise and was adopted to give clear guidance for the planning framework. It should not be changed until Aylesbury residents have been consulted on all options. The Aylesbury Vision should be deleted from the NSP.

AV.x. 1 The Aylesbury Area is: • A residential area located north of Burgess Park and between Walworth Road and Old Kent Road. It originally accommodated 2,750 homes and is characterised by large concrete slab buildings built in the mid 1960s – 70s, now at the end of their service life, which are set amongst mature trees.

I do not believe the buildings are, "at the end of their service life." There is no evidence to prove that. The council have now refurbished most of the buildings since the AAAP was adopted, costing leaseholders up to £16,000, with some work only being finished in the last few years. As there is now scope to keep the refurbished blocks there is a great need for more detailed consultation and involvement from the community as stated in Mayor's Good Practice Guide to Estate Regeneration (2018).

"Residents should be closely involved in shaping the priorities for estate regeneration and options for achieving these priorities. To achieve this, options appraisals should be open and transparent. They should:

a) Include the rationale, aims and objectives of the project in the context of: delivering better homes for local people; the landlord's strategic priorities; and neighbourhood, local, and London-wide planning and housing policies. b) Set out the factors that have informed the development of the proposed options, and

alongside the Area Action Plan.

As acknowledged in the Aylesbury Area Action Plan, following studying the structural condition of the estate, the quality of the environment and the costs of refurbishment, we concluded that it would cost too much to bring the homes up the decent homes standards. Therefore it was decided that the best way forward was to demolish the buildings and build a better place which would be much more attractive for people to live and work in. The redevelopment strategy for the estate was agreed in 2005.

The AAP sets out that 'new community facilities, shops and business space focused on Thurlow Street, the Amersham site and East Street'. It also states 'if a health facility is not located on the Amersham site it can be accommodated on Thurlow Street or East Street'. It is the intention of the AAP to provide community facilities including a new health centre, library, pharmacy, café and a public square.

Sustainability is set out in the AAP and the Development Management policies in the NSP set out the sustainability requirements for any developments coming forward.

There is a Council Plan commitment that commits us to guarantee developments on

how these have been prioritised and balanced. These factors might include: the existing characteristics and quality of an estate; the safety of existing buildings; the financial resources available; any regeneration or redevelopment plans that affect the wider area; and the wishes of residents and other stakeholders. c) Include technical and financial appraisals that have influenced any decisions on options. These should be available in an accessible format with non-technical summaries. d) Assess the full range of social, economic, and environmental costs and benefits of different options. This assessment might include: • any expected costs and savings resulting from changes in rents, service charges, energy bills and any other impacts on household expenditure; • the cost to residents' health of poor quality housing; • the financial cost to the landlord of maintaining existing homes to a reasonable standard (given the number of years for which doing so would be effective); • the number of other households who might not otherwise have a home, or a home of the right size for their needs, if the regeneration does not go ahead; and • the cost of disruption to residents' lives for the duration of the project. e) Clearly set out any options that have been discounted as unviable or undeliverable, with a transparent explanation of why they are unviable or undeliverable. f) Set out what role residents and other stakeholders have played in developing and shaping options, and how the council or housing association and other agencies have supported them in doing so."

AV.x.2 Development of the Aylesbury Area should:

Establish a local hub in the vicinity of East Street and Thurlow Street with a range of community facilities including a new Health Centre, Library, pharmacy, café and a public square.

This is ambiguous. The AAAP states it was due to be in Site 10 (Amersham). Any new vision should give more clarity not less.

If the already refurbished block of Taplow, which currently houses the health centre and pharmacy then these 2 facilities do not need to be replaced, a Hub can be created at street level in Taplow at a lower cost. Additional affordable housing could then be built in the location of the planned new health centre along with the public square and community facilities such as a new youth centre. This was the original plan for the estate. The council have not consulted or justified their vision now that properties have been refurbished.

There has already been underground work to pipework and replacement boilers to the heating network

council housing land have at least 50% council rented homes and ensure a right to return for council tenants and resident leaseholders so local people can stay in the borough they call home. Phasing of development is agreed in the planning application process.

The 'Aylesbury area' is defined in the vision map and refers to the Aylesbury Area Action Plan boundary, this has been amended in the vision.

The Aylesbury Area Action Plan and the New Southwark Plan set a requirement to deliver 50% social rented and intermediate homes in the Action Area (except in AAAP1 and AAAP4) of the approximate 4,200 planned for the Action Area. This 50% may not be all social rented homes due to financing as recognised in the AAP, however, any development will be required to provide 75% social rented homes.

for the current properties. There is therefore no mention of the energy centre or sustainability in this vision, which formed a large part of the AAAP 2010.

Be phased over a number of years to offer the maximum number of existing residents the opportunity to move into the new homes.

How is this going to happen? Phase 3 has already been activated so this is not a phased regeneration. Phase 4 are now choosing properties in Phase 1. This goes against the Mayor's Good Practice Guide to Estate Regeneration (2018), which aims to have only one move. Most residents which want to stay on the estate will have to have more than 1 move. This will disrupt thousands of people twice.

They have failed to plan any phasing correctly to minimize disruption to residents and leave residents in derelict areas. Safety is a key issue in the Mayor's Good Practice Guide to Estate Regeneration (2018).

AV.x. 3 Growth opportunities in the Aylesbury Area The Area Action Plan 2010 envisaged approximately 4,200 new homes with the provision of 50% affordable housing. The emerging direction of travel of planning policy seeks to optimise the potential of brownfield land. This suggests that it would now be appropriate to consider an increased number of homes for the Aylesbury area, with a view to moving towards replacing all the existing social rented homes in and in reasonable proximity to the original footprint of the estate. Irrespective of density, the objective of delivering 50% affordable housing should be met.

The phrase, "it would now be appropriate to consider an increased number of homes for the Aylesbury area, with a view to moving towards replacing all the existing social rented homes in and in reasonable proximity to the original footprint of the estate" is ambiguous. Clarity needs to be given as to where the increase is going to be and, "reasonable proximity to the original footprint of the estate." Are other estates and streets going to be affected? Residents in proximity of the estate have not been consulted so this should not be included.

"With a view to moving towards replacing all the existing social rented homes," needs to be consulted on. What are they being replaced with and at what rents? Will they be in accordance with the Mayor's Good Practice Guide to Estate Regeneration (2018) for affordable housing?

"Irrespective of density, the objective of delivering 50% affordable housing should be met." This is again ambiguous as the current planning permissions gives a lower density to Phase 3. This would give a net loss of social housing against the London Plan and The Mayor's Good Practice Guide to Estate Regeneration (2018).

The Aylesbury Area Vision Map was incorrect at the time of submission in January 2019. I had to notify the council that it was incorrect. It has now been changed. No reason was given for the incorrect map. There are no specific site allocations stating where the additional housing is going to be developed within the map.

The Aylesbury Area Action Plan and growth opportunities is already mentioned in the Walworth Area Vision and is on the Walworth Area Vision Map therefore there is no need for it to now be added to the NSP.

I would like to speak at the Examination in Public.

Individual: Kinglake Tenants and Residents Association
NSPPSV376

The New Southwark Plan (NSP) is not legal because Southwark Council changed their consultation procedure mid-way through the consultation process unlawfully. There is a legitimate expectation that this round of consultation should be procedurally identical to previous rounds of consultation.

The NSP is not sound because the Aylesbury Area Vision Map has been modified mid-way during the consultation cycle - the first version includes more land to the west of Walworth Road.

AV.x.3 Growth Opportunities in the Aylesbury Area:

The use of the term "brownfield land" within the Aylesbury area is ambiguous and unsound - Council estates are not "brownfield land" and should not be treated as such.

In the phrase "...replacing all the existing social rented homes in and in reasonable proximity to the original footprint of the estate" it is not clear whether the 'Aylesbury area' is the area bounded by the adopted AAAP boundary Plan, or something wider. The 'Aylesbury area' should be explicitly defined or stated to be that of the AAAP Boundary Plan.

There is particular concern that this paragraph, as phrased, will involve redevelopment of areas or estates beyond the adopted AAAP Boundary Plan. This is a possibility that has not been raised during the NSP consultation period, either generally or with nearby residents, including residents of the Rodney Estate, the Alvey Estate, or the Kinglake Estate.

The NSP in this section is not justified. There is no robust and credible evidence base to support the demolition or redevelopment of council homes surrounding the Aylesbury Estate. There has been no

The Aylesbury map in the NSP was changed to reflect the existing Area Action Plan boundary to ensure the map was accurate and therefore additional public consultation was not required.

Reference to brownfield land has been removed. The 'Aylesbury area' is defined in the vision map and refers to the Aylesbury Area Action Plan boundary, this has been amended in the vision.

As acknowledged in the Aylesbury Area Action Plan, following studying the structural condition of the estate, the quality of the environment and the costs of refurbishment, we concluded that it would cost too much to bring the homes up to the decent homes standards. Therefore it was decided that the best way forward was to demolish the

<p>consultation on this option or any alternative option.</p>	<p>buildings and build a better place which would be much more attractive for people to live and work in. The redevelopment strategy for the estate was agreed in 2005.</p>
<p>Organisation: Alvey TRA NSPPSV379</p> <p>I've only recently been made aware of the new consultation regarding the New Southwark Plan and it is not legal to change the consultation in the middle of the process. As Vice Chair of Alvey TRA I have spoken to multiple residents since last week (when I became aware of this on 15/5/19) and none of them had been given notice of this new consultation. In Southwark's own guidelines it says both: (1) The local planning authority must publish the recommendations and the reasons and (2) ... must publicise the proposed application in such manner as the person reasonably considers is likely to bring the proposed application to the attention of a majority of the persons who live at, or otherwise occupy, premises in the vicinity of the land. I would argue that each resident in the New Southwark Plan area should have been sent a hard copy of the proposed plan in the post.</p> <p>The document is quite distressing to any resident in the Aylesbury Area Vision map where on page 39 it states: "...replacing all the existing social rented homes in and in reasonable proximity to the original footprint of the estate". This plan is not sound in that there is no reason or justification to include this statement suggesting the demolition of the adjoining estates of Alvey, Kingslake and Rodney, and has not been raised with any of the residents in consultation.</p> <p>It is also not clear what is defined as 'brownfield land' in the document.</p>	<p>The Consultation Plan and the Consultation Report for the New Southwark Plan Amended Policies set out how residents and stakeholders have been consulted throughout the process. This has involved extensive consultation. Copies of the New Southwark Plan were available to view at council offices and online when it was out for public consultation.</p> <p>The 'Aylesbury area' is defined in the vision map and refers to the Aylesbury Area Action Plan boundary, this has been amended in the vision.</p> <p>Reference to brownfield land has been removed.</p>
<p>Organisation: Liam Hennessy Architects NSPPSV380</p> <p>I believe the proposed Aylesbury Area Vision is Unsound, as it has not been positively prepared, it is not justified, and it is not effective. The reasons are set out in this document. I wish to speak at the Examination in Public. Aylesbury New Area Vision.</p>	<p>As acknowledged in the Aylesbury Area Action Plan, following studying the structural condition of the estate, the quality of the environment and the costs of refurbishment, we concluded that it would cost too much to bring the homes up the decent homes</p>

Aylesbury Area Vision, or Aylesbury Area Lack of Vision states: “The Aylesbury area is characterised by large concrete slab buildings, built in the mid 1960s - 70s, now at the end of their service life.” This statement is factually wrong, as these award-winning examples prove: 2019 winner of the EU Mies van der Rohe architecture award: social housing refurbishment of three 1960s housing blocks in Bordeaux; the 2017 winner of this prestigious architecture award was the refurbishment of other large 1960s social housing blocks, in Amsterdam.

The Lack of Vision in the existing Aylesbury Area Plan has resulted in one of the most destructive schemes ever proposed and being carried out in the United Kingdom, and it may even be the most destructive an exaggeration to say destructive. It is not that it is an abusive scheme: it has been abusing people – most notably some leaseholders, and it abuses our public realm – specifically Burgess Park and Liverpool Grove Conservation Area:

1. the permanent loss of 778 homes for social rent;
2. the permanent loss of 237 affordable homes;
3. the eviction of 778 families/households from their homes and off the Estate where they live, with no right to return – because there will be 778 fewer homes for social rent on the regenerated Estate;
4. the forced eviction of Leaseholders from the homes they own, by Compulsory Purchase Orders (CPOs), with no offer of like-for-like replacement of their homes in the same area, on the same terms, so that their circumstances are not downgraded, and they can remain part of the community where they live;
5. the permanent harm being caused to Burgess Park with its serious and severe loss of public amenity due to eight proposed towers more than 10 stories tall – 14, 18, and many 20 storey towers – along Albany Road, overlooking the park, contrary to the Aylesbury Area Action Plan;
6. the permanent harm being caused to Liverpool Grove Conservation Area by the 15 storey Thug tower on Plot 18, directly in conflict with the Aylesbury Area Action Plan – both text and Masterplan map; directly in conflict with the existing street pattern; and directly in conflict with the Council’s own Policies for the protection of Conservation Areas, specifically Core Strategy Strategic Policy 12 – Design and conservation, Policy 3.15 – Conservation of the Historic Environment, and Policy 3.18 - Setting of Listed Buildings, Conservation Areas and World Heritage Sites.

The loss of 778 homes for social rent on the Aylesbury Estate – just over one-third of all 2249 homes for

standards. Therefore it was decided that the best way forward was to demolish the buildings and build a better place which would be much more attractive for people to live and work in. The redevelopment strategy for the estate was agreed in 2005.

The Aylesbury Area Action Plan sets out that we will build around 4,200 homes to replace the existing 2,700 homes.

The Aylesbury Area Action Plan and the New Southwark Plan set a requirement to deliver 50% social rented and intermediate homes in the Action Area (except in AAAP1 and AAAP4) of the approximate 4,200 planned for the Action Area. This 50% may not be all social rented homes due to financing as recognised in the AAP, however, any development will be required to provide 75% social rented homes.

There is a Council Plan commitment that commits us to guarantee developments on council housing land have at least 50% council rented homes and ensure a right to return for council tenants and resident leaseholders so local people can stay in the borough they call home.

We will continue our long-term homebuilding programme, delivering on our commitment to build 11,000 new council homes by 2043.

social rent on the Estate is one of the highest losses of homes for social rent in any regeneration project at any time in the history of the United Kingdom. For the many thousands of people waiting on Southwark Council's Housing Waiting List, the loss of nearly 800 homes for social rent in the Borough is catastrophic.

1719 homes for social rent being lost in two schemes

The planning approval for the regeneration of the Aylesbury Estate, 14/AP/3844, is predicated on the loss of 778 homes for social rent and it is predicated on the loss of 237 affordable homes: see Table 14 from the Planning Officer's Report, on the right. Homes for social rent have already been lost in the Heygate regeneration, and 778 homes for social rent are currently being lost in the Aylesbury regeneration. So a total of 1719 homes for social rent are being lost in Southwark with just these two regeneration schemes. That means just these two regeneration schemes are resulting in 1719 fewer homes available for the thousands of people on Southwark Council's Housing Waiting List.

As Lady Bracknell might say regarding the Heygate and Aylesbury: "To lose one huge estate of social housing, Southwark Council, might be regarded as a misfortune; to lose both looks like carelessness!"

The proposed Aylesbury New Area Vision doesn't mention the proposed Strategic Policy SP2 Regeneration that works for all and explain how Regeneration that works for all will work for all residents on the Aylesbury – both tenants and leaseholders, including everyone being evicted from their homes. Turning around one of the most destructive schemes ever proposed and being carried out in the United Kingdom, requires, at a minimum, a clear, accurate, precise and truthful description of the current circumstances. If the current circumstances were satisfactory, there would be no need for a New Area Vision. As the New Area Vision doesn't clarify what is wrong with the existing Aylesbury Area Vision or Lack of Vision, it means the proposed Aylesbury Area Vision is Unsound as it has not been positively prepared, it is not justified, and it is not effective.

The planning approval for the regeneration of the Aylesbury Estate, 14/AP/3844, is predicated on the loss of 778 homes for social rent and it is predicated on the loss of 237 affordable homes.

The proposed Strategic Policy SP2 states: "We will continue to revitalise our places and neighbourhoods to create new opportunities for residents, residents,.."; and "2. Investing in our communities and residents, and particularly existing residents, so that everyone can access the benefits of our regeneration programmes and the opportunities created by programmes for new homes jobs education training and

As Metropolitan Open Land, development surrounding Burgess park will be guided by Policy P56 (open space), so this does not need to be repeated as P56 is an overarching policy covering all open space in the borough.

A number of policies in the Plan seek to protect heritage in the borough. This includes Policy P20 (conservation of the historic environment and natural heritage) which sets out that development must conserve and enhance the significance of the following heritage assets and their settings including registered parks.

Aylesbury Area Action Plan area is primarily residential, therefore the focus of development in the area is for new homes. However, as set out in the AAP, about 2,500sqm of employment floorspace will be located at the junction of Thurlow Street and East Street. This space will be flexible to adapt to the needs of small and medium sized businesses. As set out in the Policy P30 (affordable workspace) any proposals over 500sqm GIA or more of employment floorspace (B class use), at least 10% of the proposed gross new floorspace as affordable workspace.

The AAP sets out that 'new community facilities, shops and business space focused on Thurlow Street, the Amersham site and East

new infrastructure ”

According to Government Live Tables figures for the four most recent years, 2014 to 2018, Southwark Council has lost 540 units of its local authority dwelling stock. From Table 116: Southwark local authority dwelling stock was 39,029 in 2014 and 38,489 in 2018.

That is a loss of 540 units.

Clearly the proposed Aylesbury Area Vision will need to stop the haemorrhaging of social housing in Southwark if Regeneration that works for all is to work for the many thousands of Southwark residents currently on its Housing Waiting List. In each of the most recent 4 weeks of bidding cycles (to Sunday 12 May 2019) for one-bedroom flats there were a grand total of 1, 1, 2 and 2 flats, respectively, available for residents bidding! In consequence there were more than 500 residents bidding for just one flat.

The proposed Aylesbury Area Vision presents no explanation as to how these chronic circumstances will be or can be turned around. The Aylesbury Area Vision makes no mention of accommodation for smaller scale businesses. There is a strong demand for industrial space of the type that can be made compatible with residential use, to meet the needs of Southwark businesses. Such a large area as the Aylesbury should not be conceived solely as a housing estate. There should be space for workshops, studios and workrooms, small depots and yards, builders merchants, weaved together with the housing and the rest of the non-residential spaces required in a significant piece of city.

The proposed Aylesbury Area Vision is therefore Unsound as it has not been positively prepared, it is not justified, and it is not effective.

Aylesbury Medical Centre and adjacent Taplow Pharmacy, both on Thurlow Street. Aylesbury Area Action Plan Introduction: “Design excellence will be at the core of the redevelopment and we will emphasise and control design quality at each stage of the project to create a varied and interesting new residential neighbourhood.”

Existing Core Strategy Strategic Policy 12 – Design and conservation: “Development will achieve the highest possible standards of design of buildings and public places to help create attractive and distinct places which are safe, easy to get around and a pleasure to be in. We will do this by expecting development to conserve or enhance the significance of

Southwark’s heritage assets, their settings and wider historic environment, including conservation areas”. Reality: Urban vandalism promoted and approved by Southwark Council Planners and approved by the Design Review Panel: The Thug.

Amended Policy SP2 proposes: “Enhancing local distinctiveness and heritage-led regeneration by requiring

Street’. It also states ‘if a health facility is not located on the Amersham site it can be accommodated on Thurlow Street or East Street’. It is the intention of the AAP to provide community facilities including a new health centre, library, pharmacy, café and a public square.

A number of policies within the NSP require high quality design in all types of development, these fall under the strategic policy SP2.

As Metropolitan Open Land, development surrounding Burgess park will be guided by policy P56 (open space), so this does not need to be repeated as P56 is an overarching policy covering all open space in the borough.

Any planning application for development near Burgess Park will be assessed against Policy P54 (protection of amenity). Any planning application for tall buildings will be assessed against all the relevant policies of the NSP, including Policy P16 (tall buildings).

Strategic SP5 sets out that we will seek to achieve a safer cycling network. The vision does acknowledge that development should include excellent cycling provision. In addition, any development will need to comply with Policy P52 (cycling).

Reference to brownfield land has been

the highest possible standards of design, creating vibrant, attractive, healthy, safe and distinctive buildings and places that install pride of place in our communities. This will include green infrastructure and opportunities for healthy activities and improving streets, squares and public places between buildings.” Strategic Policy SP2: Regeneration that works for all doesn’t explain how regeneration that works for all will work by “enhancing local distinctiveness and heritage-led regeneration” for Liverpool Grove Conservation Area, a major heritage asset, and one of the Borough’s areas most affected by regeneration. The Aylesbury Area Vision doesn’t set out how the regeneration will enhance and protect the heritage asset that is the Liverpool Grove Conservation Area. The Aylesbury Area Vision is therefore Unsound as it has not been positively prepared, it is not justified, and it is not effective. Aylesbury Road and the Liverpool Grove Conservation Area are in the process of being vandalised: existing street pattern ignored; existing green open space permanently destroyed. Every tree in these images from just a few years ago – 2015 and 2016 - has been cut down, to be replaced by a vandalising 15 storey Thug tower. Strategic Policy SP2: Regeneration that works for all doesn’t explain how regeneration that works for all will work by “enhancing local distinctiveness and heritage-led regeneration” for Liverpool Grove Conservation Area, a major heritage asset. The Aylesbury Area Vision doesn’t set out how the regeneration will enhance and protect the heritage asset that is the Liverpool Grove Conservation Area. The Aylesbury Area Vision is therefore Unsound as has not been positively prepared, is not justified, and is not effective.

More than one-third of the area included in the proposed Aylesbury Area Vision Map is taken up by Burgess Park, yet there is not one single Vision proposed for Burgess Park. Burgess Park is designated as Metropolitan Open Land (MOL) and also as a Site of Importance for Nature heritage assets Lack of MOL), Conservation (SINC). Core Strategy Strategic Policy 11 – Open spaces and wildlife presents Burgess Park as: “Protected Open Space designated as Site of Importance for Nature Conservation” – see map below AreaVision below. The Aylesbury Area Vision makes no reference to Burgess Park’s status. At a minimum, the proposed Aylesbury Area Vision should recognise that Burgess Park is a major heritage asset, protected Metropolitan Open Land, and protected Site of Importance for Nature Conservation. As set out in The London Plan “Policy 7.17 Metropolitan Open Land, planning decisions: The strongest protection should be given to Metropolitan Open Land and inappropriate development refused.” The proposed Aylesbury Area Vision should explain what this London Plan Policy means for Burgess Park, and how it should be

removed.

taken to include development alongside, adjoining, or close to the perimeters of Metropolitan Open Land and Site of Importance for Nature Conservation; development alongside perimeter roads adjoining Metropolitan Open Land and Site of Importance for Nature Conservation; and not just to development on Metropolitan Open Land.

Giving Metropolitan Open Land the “strongest protection” should mean exactly that, so the precise consequences for development adjacent to Burgess Park should be explained in the Aylesbury Area Vision: no harm of any kind – including significant overshadowing - to protected Metropolitan Open Land or Site of Borough Grade 1 Importance for Nature Conservation being allowed.

The Aylesbury Area Vision makes no mention of nor gives any explanation of how development around one of Southwark’s most important heritage assets – Burgess Park - should be obliged to conserve and enhance the significance of this heritage asset, and especially its setting all along Albany Road. The Aylesbury Area Vision makes no mention of two critical issues for Burgess Park and its users: overshadowing and overlooking.

The Aylesbury Area Vision is therefore Unsound as it has not been positively prepared, it is not justified, and it is not effective.

Burgess Park is designated both as Metropolitan Open Land (MOL), and also as a Site of Importance for Nature Conservation (SINC).

The current regeneration proposals for numerous residential towers overlooking Burgess Park – up to 20 storeys tall, along Albany Road - are in direct conflict with New Southwark Plan Policy P18:

Conservation of the historic environment and natural heritage, which states that new development must:

“1.1 Conserve and enhance the significance of the following heritage assets and their settings:

iv. Registered parks and gardens”; and New Southwark Plan Policy P54: Protection of amenity states that:

“1 Development should be permitted when it does not cause an unacceptable loss of amenity to present or future users”.

Residential towers up to 20 storeys tall result in major overlooking of Burgess Park, and therefore cause major loss of amenity to present and future users of this heritage asset. The current regeneration proposals for the Aylesbury are therefore in direct conflict with Strategic Policy SP2: Regeneration that works for all.

Strategic Policy SP2: Regeneration that works for all should mean regeneration that causes no harm of any kind to Metropolitan Open Land or a Site of Importance for Nature Conservation. The seven towers (above 10 storey) proposed for Albany Road will necessarily harm the heritage asset of Burgess Park by

diminishing its amenity value as tall towers cannot be screened (see next pages). The proposed increased density could cause further severe harm if building heights are not limited to 10 storeys along Albany Road. Strategic Policy SP2: Regeneration that works for all doesn't explain how regeneration that works for all will work for Burgess Park, a major heritage asset, and one of the Borough's areas most affected by regeneration.

The Aylesbury Area Vision doesn't set out how the regeneration will enhance and protect the heritage asset that is Burgess Park, which Southwark Council is legally obliged to protect.

The Aylesbury Area Vision is therefore Unsound as it has not been positively prepared, it is not justified, and it is not effective.

The Aylesbury Area Action Plan (2010) in Figure 10: Building heights plan (see previous page) shows 4 towers along Albany Road, described as follows:

"one district landmark building of between 15 and 20 storeys at the junction of Thurlow Street and Albany Road to mark the main entrance to the neighbourhood and symbolise the area's regeneration; (three) local landmark buildings of between 10 and 15 storeys to mark the entrances to Portland Street, the King William IV and Chumleigh green fingers and also the Amersham Site."

The Aylesbury Area Action Plan is out of date: there are no King William IV or Chumleigh green fingers, or any other green fingers. The Aylesbury Area Action Plan specifically describes one district landmark building of between 15 and 20 storeys at the junction of Thurlow Street and Albany Road. The Aylesbury Area Action Plan could hardly be clearer: both in the illustrated Figure 10 and the very explicit words. However, the AAAP has been sidelined: the current proposals are for 2 residential towers of 20 storeys at the junction of Portland Street and Albany Road, and two further towers of between 18 and 20 storeys at the junction of Thurlow Street and Albany Road. These - as with all the proposed towers along Albany Road - are designated as 100% for private sale. According to the Aylesbury Area Action Plan the towers should be "elegant and slender". In the context of fingers, maybe the multiple paired towers can be described as giving two fingers to Burgess Park?

Residential towers up to 20 storeys tall result in major overlooking of Burgess Park - as shown above - and therefore cause major loss of amenity to present and future users of this heritage asset.

Strategic Policy SP2: Regeneration that works for all should mean regeneration that causes no harm of any kind to Metropolitan Open Land or a Site of Importance for Nature Conservation. The eight towers (above 10 storey) proposed for Albany Road will necessarily harm the heritage asset of Burgess Park by diminishing its amenity value as tall towers cannot be screened (see next pages). Strategic Policy SP2: Regeneration that works for all doesn't explain how regeneration that works for all will work for

Burgess Park, a major heritage asset, and one of the Borough's areas most affected by regeneration. The Aylesbury Area Vision doesn't set out how the regeneration will enhance and protect the heritage asset that is Burgess Park, which Southwark Council is legally obliged to protect. The Aylesbury Area Vision is therefore Unsound as it has not been positively prepared, it is not justified, and it is not effective.

Albany Road – existing well-mannered 10storey Arments Court.

With a great deal of planning, planting, and decades of time, it is possible to screen 10storey buildings outside the perimeter of the park. Successful examples include buildings along Prince Albert Road on the north side of Regent's Park;

Albany Road – proposed 18-20 storey towers - 2 fingers to Burgess Park and its users

Regardless of the amount of planning, and regardless of how many decades of time, it is NOT possible to screen 15 or 20 storey buildings outside the perimeter of the park. Therefore the amenity value of park for the apartment Regent s its users is necessarily and seriously diminished. Unsuccessful examples: towers diminishing

along Bayswater Road between Porchester Terrace and Inverness Terrace on the north side of Kensington Gardens; and along Piccadilly on the north side of The Green Park.

the the amenity value of parks can be seen at the Lancaster Gate Hotel on Bayswater Road, overlooking both Hyde Park and Kensington gardens, or, nearer home, the tower alongside Southwark Park.

Burgess Park is designated both as Metropolitan Open Land (MOL), and also as a Site of Importance for Nature Conservation (SINC). The current regeneration proposals for numerous residential towers overlooking Burgess Park – up to 20 storeys tall, along Albany Road - are in direct conflict with New Southwark Plan Policy P18: Conservation of the historic environment and natural heritage, which states that new development must: "1.1 Conserve and enhance the significance of the following heritage assets and their settings: iv. Registered parks and gardens"; and New Southwark Plan Policy P54: Protection of amenity states that: "1 Development should be permitted when it does not cause an unacceptable loss of amenity to present or future users".

The eight towers (above 10 storey) proposed for Albany Road will necessarily harm the heritage asset of Burgess Park by diminishing its amenity value as tall towers cannot be screened.

With very careful planning and planting, and several decades of time, 10storey buildings outside the perimeter of the park can be screened – as illustrated above.

Strategic Policy SP2: Regeneration that works for all doesn't explain how regeneration that works for all will work for Burgess Park, a major heritage asset, and one of the Borough's areas most affected by regeneration. The Aylesbury Area Vision doesn't set out how the regeneration will enhance and protect the heritage asset that is Burgess Park, which Southwark Council is legally obliged to protect. The Aylesbury Area Vision is therefore Unsound as it has not been positively prepared, it is not justified, and it is not effective.

The 10 to 12 storey buildings in the photos on the left and right can also be seen – if you look very, very carefully – in the central photo, taken nearby in Kensington Gardens. This is one example demonstrating that 10 storey buildings can be screened from a park. Other good examples of 10 storey, approx, buildings that don't harm the adjacent parks are the fine apartment buildings along Prince Albert Road on the north side of Regents Park, and the buildings along Piccadilly on the north side of The Green Park.

Buildings of 9, 10, 11 storeys are 'everywhere', as these examples from Pimlico Road, Sloane Avenue and Old Kent Road show. The first two are in areas of highest density.

Anyone hoping to plan high density buildings that don't harm our urban realm would do well to follow the Latin word of exhortation: "Circumspice". It means 'look around'. The proposed Aylesbury Area Vision is Unsound as it has not been positively prepared: there is no explanation of what increased density is proposed or how that will be achieved. The Aylesbury Area Vision is therefore not justified, and not effective.

The Aylesbury Area Action Plan (2010) map page 60 titled Figure 14: Cycle network is shown here on the right. The Aylesbury Area Action Plan proposals were developed before the first segregated cycleway was built in London. The proposed Aylesbury Area Vision takes no account of how cycling in London has been transformed in the intervening years, and therefore how far greater provision for cycling should be presented in the Aylesbury Area Vision. Removing cycle routes from most, if not all, of Burgess Park would be an example of the kind of Vision that is missing from the Aylesbury Area Vision. Proposals to have segregated cycle ways on all roads surrounding Burgess Park would enable such a Vision. Parents of small children have posted comments saying that they are deterred from taking their children to enjoy Burgess Park because of the danger from cyclists – see many comments below.

Some online comments from users, or potential users, of Burgess Park:

We live a few minutes walk from Burgess Park but we rarely visit anymore unfortunately, because of the

speeding cyclists. I think it's great that cycling is being encouraged more in London, but both cyclists and pedestrians need their routes protected. I have three children and cannot let them walk to the park freely, it's just too dangerous, as, at any moment, a cyclist will whizz past. Last summer I saw a young boy on a scooter get hit by a cyclist, it was horrendous. So we just don't go anymore, which is a real shame because it's a lovely park and would be a nice place to spend time, especially with my 1 year old. I know of several friends of mine with children who have said the same thing, and one whose child has been hit by a bike in Burgess Park several years ago, so these accidents must be happening regularly.

It's ridiculous. But unfortunately they have all the rights. Our children and pets are not safe to use the park freely which is a real shame. When will they do something about it... when someone dies.

Same, I gave up years ago, use to walk my son to school from the canal up to Walworth Road but was like dicing with death, Pedestrians & children on scooters have to give way to cyclists on the footpaths these days. Not all are bad - but many whizz by and rarely use a bell or slow up as they pass. I feel like I'm crossing a main road every time I cross a path: 'look left, look right' etc. The underpass under Wells Way can also be a speeders hot spot. I walk my dog early in the morning - the cyclists seem to think it's funny to come up behind you very close and then speed past you. If you was to step to the side they would run straight into you.

They have no consideration for other park users. People have called the canal pathway - tour de burgess, I think that what I am seeing here in Holland actually is separate lanes for cyclists and pedestrians - I never understood why Burgess Park didn't learn from other countries and planned separate paths...

says it all. Many of these bikes have no bells & the cyclists are all of an age... where they could use the roads either side of the park for their commute... but they choose to use the park like a speedway, where they can dominate.

I remember when you couldn't cycle through the park unless you were a child, if you were older the park keeper would tell you to get off.

Southwark Council should have a visionary response to such a major flaw in the current facilities, or lack of facilities, for cyclists.

Aylesbury Area Vision AV. x .2 states: "Development of the Aylesbury Area should: Deliver homes and a wider urban environment suitable for residents at all stages of their lives, encouraging people to live and work locally. This will include excellent cycling provision..."

But there is no explanation of what "excellent cycling provision" means. There is not a single mention of

segregated cycleways, something which for many people would be a sine qua non of “excellent cycling provision”. Removing existing cycle routes from most, if not all, of Burgess Park and providing segregated cycleways on all roads surrounding the park will involve significant Vision and planning. As the Aylesbury Area Vision makes no reference to any such proposals, it is therefore Unsound. It has not been positively prepared, it is not justified, and it is not effective.

Approved towers overlooking Burgess Park – approved by Southwark Planners: 12 storeys added, in direct conflict with the Aylesbury Area Action Plan.

The Aylesbury Area Action Plan showed 2 “local landmark buildings of between 10 and 15 storeys” – see page 4 in this document. But the Planners approved 3 towers: one 14 storeys, one 18 storeys, and one 20 storeys – that means 12 extra storeys, highlighted in red above. The reason is clear: greed – at the direct expense of Burgess Park and its users. The proposed towers are 100% for private sale – replacing lower Aylesbury buildings that were designed and built as 100% social housing. The existing 10 storey building - called Arments Court - is added on the left to give a better idea of the colossal scale of the approved towers. The consequences for Burgess Park are permanent and severe harm, due to its loss of amenity from tall towers overlooking the park. The Amenity of Burgess Park is supposed to be ‘protected’ according to planning policies. The proposed Aylesbury Area Vision proposes an open ended increase in density. Southwark Planners have already approved severe harm to Burgess Park. With an increase in density on the Aylesbury, the possibility of having many more towers and/or towers of increased height overlooking Burgess Park is real and imminent.

An increase in density is acceptable and achievable without harming Burgess Park: the lower buildings of 5 or 6 storeys – some shown above - can be increased to 10 storeys.

As shown in this document, buildings of 10 storeys can be screened from the park - thereby preserving its amenity value - but not towers of 15 or 20 storeys.

The Aylesbury Area Vision is Unsound as it is not effective in protecting our heritage assets.

Individual
NSPPSV381

This is a submission to SNP Aylesbury Area Vision, policy AV x1,2,3, on behalf of Walworth Greens. We would like to speak at the Examination in Public. Please kindly confirm receiving this email.

As Metropolitan Open Land, development surrounding Burgess park will be guided by policy P56 (open space), so this does not need to be repeated as P56 is an overarching policy

We do not consider the New Southwark Plan: Aylesbury Area Vision neither legally compliant nor sound.

It is not legally compliant as

1. the suggested regeneration plans do not protect Burgess Park, which forms more than one-third of the area included in the proposed Aylesbury Area Vision Map, from the inappropriate development currently proposed, in accordance with Southwark Council's legal obligation. The proposed Aylesbury Area Vision doesn't mention their legal obligation to protect Burgess Park as Metropolitan Open Land.
2. The Aylesbury Area Vision Map has been modified mid-way during the consultation cycle,

Suggested improvement:

The proposed Aylesbury Area Vision should recognise that Burgess Park is a major heritage asset, and protected Metropolitan Open Land. It should include a specific vision for the park and clearly formulate plans for its protection from the insensitive design of unproportionally high buildings to minimise overshadowing and loss of amenity, in line with the park's shape and further enhancements to children's play provision and sports facilities. It should include a continuation of green spaces into new Aylesbury development, which was removed from the original Aylesbury plan of 2010.

The Aylesbury Area Vision Map needs to remain identical to the original AAAP Boundary Plan.

The Aylesbury Area Vision is not sound, because it has not been positively prepared, it's unjustified and is not effective.

It has not been positively prepared, as

1. The fact that the Aylesbury area as described here is not properly defined can be seen as intentionally intended to be opened to various interpretations, especially paving a path to redeveloping areas beyond the original AAAP Boundary Plan whenever convenient to planners in future. Such possibility was not raised, discussed or consulted with any of the neighbouring estates or areas. and their residents.
2. Using the term "brownfield land" within this plan is pejorative, does not acknowledge the presence of current residents, undermines their right to occupy the land and makes the demolition of their homes easier and therefore more likely.
3. This plan was worked out without proper consideration of the needs of local people, protected groups such as elderly and BAME, protected metropolitan land Burgess Park, and without duly considering the impact on the environment due to demolitions and increased density.

covering all open space in the borough.

The Aylesbury map in the NSP was changed to reflect the existing Area Action Plan boundary to ensure the map was accurate and therefore additional public consultation was not required.

A number of policies in the Plan seek to protect heritage in the borough. This includes Policy P20 (conservation of the historic environment and natural heritage) which sets out that development must conserve and enhance the significance of the following heritage assets and their settings including registered parks.

The 'Aylesbury area' is defined in the vision map and refers to the Aylesbury Area Action Plan boundary, this has been amended in the vision.

Reference to brownfield land has been removed.

We produced an Equalities Impact Assessment for the Aylesbury Area Action Plan in 2009, we have also prepared an Equalities Impact Assessment as part of the Integrated Impact Assessment for each version of the New Southwark Plan. A standalone Equalities Impact Assessment has been prepared for the Submission version of the New Southwark

It is not justified, as

1. it is not adhering to the results of Aylesbury estate's tenants and leaseholders ballot of 2000/2001 which supported refurbishment and refused demolition of the estate.
2. It claims that the Aylesbury concrete slab buildings are “now at the end of their service life”. This is an unsubstantial meaningless statement Many concrete slab buildings from the same period can be and are being refurbished such as the Ledbury Estate.
3. The inclusion of social rented homes in “reasonable proximity” to the original footprint of the estate is extremely vague and unjustified. This wording increases the scope of the Area Vision without any explanation and consultation.
4. It is inconsistent with the now accepted declaration of climate emergency both by Southwark Council and The Mayor of London which cannot be achieved without stopping all unnecessary demolitions due to embedded carbon and a complete rethinking of the current proposal.

It is not effective, as

1. Unlike the original Aylesbury Estate, the plan does not provide a sufficient mix of 3, 4 and 5-bed family homes, homes which are most needed by those on the social housing waiting list.
2. There is not sufficient emphasis on existing social rented tenants within this vision.
2. There is no effective provision for cycling in the proposed Aylesbury Area Vision. There is a particular need to address cycling within Burgess Park following complaints around cyclists posing a threat to vulnerable park users.

What changes are needed to make the plan sound:

The Aylesbury vision plan needs to be completely rethought with due consideration on the impact on the existing community and the environment. No council housing should be lost and the buildings should be refurbished as legitimised by the Estate ballot.

Plan.

As acknowledged in the Aylesbury Area Action Plan, following studying the structural condition of the estate, the quality of the environment and the costs of refurbishment, we concluded that it would cost too much to bring the homes up the decent homes standards. Therefore it was decided that the best way forward was to demolish the buildings and build a better place which would be much more attractive for people to live and work in. The redevelopment strategy for the estate was agreed in 2005.

The Aylesbury Area Action Plan and the New Southwark Plan set a requirement to deliver 50% social rented and intermediate homes in the Action Area (except in AAAP1 and AAAP4) of the approximate 4,200 planned for the Action Area. This 50% may not be all social rented homes due to financing as recognised in the AAP, however, any development will be required to provide 75% social rented homes.

Policy P2 (New Family Homes) sets out the requirement to provide family homes in proposed developments to ensure we meet the needs of our residents, in particular tenants with a social rented housing need.

The vision does acknowledge that development should include excellent cycling

	provision.
<p>Individual NSPPSV382</p> <p>See feedback already provided - beginning of this horrendous doc. Make it easier to provide feedback rather than have to work through 24 page template.</p>	<p>We are unable to provide a response due to a lack of detail.</p>
<p>Organisation: Southwark Clinical Commissioning Group NSPPSV383</p> <p>Southwark Clinical Commissioning Group's response to consultation to the New Southwark Plan Proposed Submission version: Amended Policies 2019</p> <p>Thank you for consulting Southwark CCG on the 2019 amended policies to the New Southwark Plan Proposed Submission version. This response has been prepared by the NHS London Healthy Urban Development Unit on behalf of the CCG following detailed discussions. We very much see this as part of our ongoing engagement between the CCG, other health partners and the Council.</p> <p>We suggest an amendment to the fifth bullet under "Development of the Aylesbury Area should: Deliver excellent design that expresses timeless quality and variety, creating and contributing to the sense of different districts and the health and wellbeing of communities across the development area."</p>	<p>Comment noted and amendment has been made.</p>
<p>Individual NSPPSV384</p> <p>you have not improved the area at all in fact the rents are three times higher than what they used to be the people that bought the original council houses have now lost that house and are either homeless or have to set up in another home outside of London I do not know what kind of game you guys are playing</p>	<p>There is a Council Plan commitment that commits us to guarantee developments on council housing land have at least 50% council rented homes and ensure a right to return for council tenants and resident leaseholders so local people can stay in the borough they call home.</p>

	<p>The Aylesbury Area Action Plan and the New Southwark Plan set a requirement to deliver 50% social rented and intermediate homes in the Action Area (except in AAAP1 and AAAP4) of the approximate 4,200 planned for the Action Area. This 50% may not be all social rented homes due to financing as recognised in the AAP, however, any development will be required to provide 75% social rented homes.</p>
<p>Individual NSPPSV385</p> <p>I am writing to share my concerns regarding the Aylesbury Area Vision. The Aylesbury Area Action plan in 2010 continues to be expanded in terms of the density of housing and most disturbingly, the height of the towers being built. I object strongly to any further increase in Tower height. I believe it will impact Burgess Park as a critical local amenity. I use this park at least twice a day everyday.</p> <p>In addition I believe that it will have a detrimental impact on the local area reducing what little light will already exist in the area. I am also concerned that the local infrastructure (parking and buses on walworth road, hygiene) will not be able to cope with the significant uptick in numbers.</p> <p>Please note my objections as part of this consultation and please place limit on the tower / story height along Albany road to protect our community park.</p> <p>As a resident next door to this area and a daily user of burgess park I am concerned that these plans are unsound - continuint to increase density and in particular increase the height of towers overlooking the park (and shadows on those homes on the other side of the buildings) will be de trimental to areas of common use as well as long standing residents of Southwark. Separately in concerns me greatly that these boundaries continue to be broken and expanded. It does not appear that the views of residents are taken into account at all. This process in itself is a minefield to respond to. Please do not dismiss where we have grouped together to try to clearly articulate common points of concern.</p>	<p>As Metropolitan Open Land, development surrounding Burgess park will be guided by policy P56 (open space), so this does not need to be repeated as P56 is an overarching policy covering all open space in the borough.</p> <p>Any planning applications for development in the Aylesbury Area Action Plan area will be assessed against all the policies in the New Southwark Plan. These policies seek to protect amenity and any impact of proposed development on local infrastructure will be carefully assessed and mitigated where necessary.</p>

Area Visions provide the strategic vision for the future of Southwark's distinct places. Burgess Park is a distinct place and the indicative map of the Aylesbury Vision area includes Burgess Park but does not set out any opportunities for enhancements or public realm improvements or the relationship between the park and the proposed developments despite the aspiration for the Aylesbury area to be "stitched back" into the local area.

The Aylesbury new developments and the relationship to Burgess Park is a key aspect of the distinctive nature of the area. The park occupies at least one third of the map presented alongside the Aylesbury Vision. The vision is unsound because it does not adequately address the relationship between the park and the new development.

Amended Policy NSP P14: Tall buildings specifies buildings should have a positive relationship to the public realm; Burgess Park in this location.

The impact of the proposed buildings for the north of Burgess Park must take into account the "emerging context" on the south side of the park. This has changed significantly since the Aylesbury AAP 2010 with the proposed developments of the Burgess Business Park site allocation.

The character of Burgess Park will be substantially changed with 10-20 storey buildings along the majority of the boundary of the park.

The draft Aylesbury Vision is not justified because it does not address the potential changes in the vision and set out a strategic vision which protects the current characteristics of Burgess Park which currently enjoys right to light, views of the sky and minimal shadowing of the park impeded by buildings. Burgess park is a critical asset to the community and a point of intersection of cycle and foot traffic as well as thousands of recreational visitors. Any future development in this area should:

Stitch back into the surrounding context and enhance the ability for pedestrians and cyclists to get around a network of attractive tree-lined streets and public open spaces, arranged around a loose grid of well designed urban blocks and connect to existing and planned cycle routes linking the area into the surrounding neighbourhoods and transport nodes maximising the opportunity for cycle routes along the length of Albany Road.

<p>Deliver excellent design that expresses timeless quality and variety, creating and contributing to the sense of different districts across the development area. Along Albany Road contributing to the setting immediately opposite to Burgess Park with high quality exemplary design minimising the environmental impact on the park and impact on light , shadow and sunshine .</p>	
<p>Organisation: HTA Design (on behalf of Joseph Homes) NSPPSV391</p> <p>No further comment applied</p>	<p>We are unable to respond due to a lack of detail.</p>
<p>Organisation: Alvey estate tenants and leaseholders association (ATLAS) (& liaison with some of neighbouring Kinglake TRA) NSPPSV396</p> <p>This is Another Legalistic ILLEGAL QUESTION WHICH SEEKS TO IMPOSE AN IDEOLOGICAL SOCIAL CLEANSING NARRATIVE ON SOCIALLY DEPRIVED OR ESTHIC MINORITIES WHO ARE IN REALITY LARGELY EXCLUDED FROM THIS TOP DOWN APPROACH AND HAVE NEVER BEEN ASKED. Note when aylesbury est tenants and leasholders had a ballot in 2000/2001 they voted overwhelmingly NO. A first step to getting any semblance of fairness is to RECOGNISE THE BALLOT AND SCRAP THE AYLESBURY PLAN WHICH IS ITSELF ILEGAL FOR A NUMBER OF REASONS - mentioned in the recent CPO enquiries on Aylesbury estate: - ballot overruled - Council decision in 2002 to trash ballot in was illegally conducted because councillors were not informed of certain matters, given false information and lied to by officers. - the right to light is curtailed by the overdevelopment and this violates Lbs own policies.</p>	<p>As acknowledged in the Aylesbury Area Action Plan, following studying the structural condition of the estate, the quality of the environment and the costs of refurbishment, we concluded that it would cost too much to bring the homes up the decent homes standards. Therefore it was decided that the best way forward was to demolish the buildings and build a better place which would be much more attractive for people to live and work in. The redevelopment strategy for the estate was agreed in 2005 which was supported by over 50% of residents.</p>
<p>Organisation: Southwark Cyclists NSPPSV164</p> <p>AV.x.2 fails to refer to or reflect the Mayor’s Healthy Streets Approach, in particular the need to reduce moving and stationary motor vehicles. Given the density of the development proposed, without zero car</p>	<p>Policy SP5 and its associated policies seek to encourage Southwark to grow sustainably without adverse environmental impacts through car free development in highly</p>

parking (other than disabled) and filtered permeability, conditions for walking and cycling would be poor and the area would not score highly under the Healthy Streets Indicators.

The cycle routes shown on the Aylesbury area vision map is not consistent with maps in the Southwark Cycling Strategy, Local Implementation Plan 3 or TfL's Business Plan, while key desire lines are not provided for. Moreover the map fails to distinguish between existing, proposed funded and unfunded routes or set out any timeline for delivery, despite such delivery being particularly important for the AAAP4 and AAAP2 areas which have low Public Transport Accessibility Levels. This means the area vision is not effective. The map should also show the network for through motor traffic in order to help plan the regeneration area as a low traffic neighbourhood. AV.x.1 should be amended to refer to good walking and cycling accessibility in line with the New London Plan policy D9, and AV.x.2 amended to refer and incorporate the Mayor's Healthy Streets Approach.

accessible areas and reduced reliance on the private car and encourage cycling and other modes of sustainable transport.

The cycle routes have been updated on the vision map.

Organisation: Residents of the Rodney Estate
NSPPSV399

"The Area Action Plan 2010 envisaged approximately 4,200 new homes with the provision of 50% affordable housing. The emerging direction of travel of planning policy seeks to optimise the potential of brownfield land. This suggests that it would now be appropriate to consider an increased number of homes for the Aylesbury area, with a view to moving towards replacing all the existing social rented homes in and in reasonable proximity to the original footprint of the estate. Irrespective of density, the objective of delivering 50% affordable housing should be met."

Rodney TRA supports the provision of more social rented homes. We believe that the Council should commit in the NSP to providing COUNCIL HOMES, not just "social rented homes", and that there should be like for like replacement of all Aylesbury council homes with council homes for rent.

However, this section is poorly phrased, ambiguous and unclear.

Council estates are not "brownfield land". The use of the term "brownfield land" is pejorative, not descriptive. To make a relevant comparison, streets of privately-owned terraced houses in Dulwich, for example, would not be termed as "brownfield land". The use of the term "brownfield" for the Aylesbury and adjacent council estates does not acknowledge the presence of current residents, undermines our

We will continue our long-term homebuilding programme, delivering on our commitment to build 11,000 new council homes by 2043.

The Aylesbury Area Action Plan and the New Southwark Plan set a requirement to deliver 50% social rented and intermediate homes in the Action Area (except in AAAP1 and AAAP4) of the approximate 4,200 planned for the Action Area. This 50% may not be all social rented homes due to financing as recognised in the AAP, however, any development will be required to provide 75% social rented homes.

There is a Council Plan commitment that commits us to guarantee developments on council housing land have at least 50% council rented homes and ensure a right to return for council tenants and resident leaseholders so

right to occupy the land and makes the demolition of our homes more palatable to policy makers, and therefore more likely.

It is not clear whether the “Aylesbury area” is the area bounded by the adopted AAAP Boundary Plan, or something wider.

The “Aylesbury area” should be explicitly defined or stated to be that of the AAAP Boundary Plan. We are concerned that as this paragraph as phrased it will involve redevelopment of areas or estates beyond the adopted AAAP Boundary Plan. This is a possibility that has not been raised during the lengthy NSP consultation period, either generally or with nearby residents, including residents of the Rodney Estate, the Alvey Estate or the Kinglake Estate.

The NSP in this section has not been positively prepared.

The objectively assessed need for social rented housing in this area has not been sustainably met. There is no assessment of the sustainability of demolition of existing council homes on surrounding estates.

The NSP in this section is not justified.

There is no robust and credible evidence base to support the demolition or redevelopment of council homes surrounding the Aylesbury Estate. There has been no consultation on this option or any alternative option.

The NSP in this section is not effective.

The Plan for the provision of further social rented homes on so-called “brownfield land” is not clear or robust. The Plan is confusing and could have at least two different meanings. Either it could mean that all the Aylesbury homes could be delivered on the surrounding estates, or the homes on the surrounding estates could be demolished and new homes could be delivered there. This makes the Plan in this section unachievable.

Therefore, this part of the NSP is not positively prepared, is unjustified, unsound and ineffective.

This section should be deleted.

local people can stay in the borough they call home.

Reference to brownfield land has been removed.

The ‘Aylesbury area’ is defined in the vision map and refers to the Aylesbury Area Action Plan boundary, this has been amended in the vision.

As acknowledged in the Aylesbury Area Action Plan, following studying the structural condition of the estate, the quality of the environment and the costs of refurbishment, we concluded that it would cost too much to bring the homes up to the decent homes standards. Therefore it was decided that the best way forward was to demolish the buildings and build a better place which would be much more attractive for people to live and work in. The redevelopment strategy for the estate was agreed in 2005.

The redevelopment has taken time and residents have had the opportunity to comment on the proposals throughout the process.

Individual
NSPPSV148

The Aylesbury Area Action Plan and the New

The policy is unsound in terms of its evidence and deliverability. The phrase “replacing all the existing social rented homes inside and in reasonable proximity to the original footprint of the estate” suggests an increase in the demolition of much valued social rented homes and their replacement with “affordable housing”. There is no supporting documentation to justify this. One might have expected a cost benefit analysis to consider the social and environmental (embodied carbon) costs of such demolition alongside a viability assessment. This is unsound in term of evidence.

In fact, the area vision makes no positive reference to social rented housing and is a diminution of the vision in the Area Action Plan (AAP) that recognises “the high quality social rented housing” of the estate and requires “of the affordable housing provided, 75% should be social rented”.

It seems that the development of the area vision for the New Southwark Plan is not subject to the “regeneration for all” principles in SP2. A social regeneration charter would be a good mechanism for reviewing the vision, bringing into the process community groups and equality groups but for the Aylesbury and Walworth area is being prepared exclusively by housing developers and organisations that are closely aligned with the Council. The same housing developers that have not honoured the vision in the AAP and have replaced social rented housing with the higher rents of the affordable rent product.

Point 1 of SP2 refers to the importance of play spaces, and this must feature in the area vision. It is particularly relevant on the Aylesbury where 4 play spaces have been lost or will be lost.

Individual
NSPPSV402

The plan for the provision of further rented homes on so called “brownfield land” is not clear or robust. The Plan is confusing and could have at least more than one meaning. Therefore this part of the NSP is not positively prepared. It is unjustified, unsound and ineffective. This section should be deleted.

The use of the term “brownfield land” is pejorative and it does not take into account the presence os residents and undermine our rights to occupy the land.

The Aylesbury Area Vision Map was modified half way through the consultation period, this means that the plan is unsound. As a council tenant I support the provision of more social rented homes. I believe that

Southwark Plan set a requirement to deliver 50% social rented and intermediate homes in the Action Area (except in AAAP1 and AAAP4) of the approximate 4,200 planned for the Action Area. This 50% may not be all social rented homes due to financing as recognised in the AAP, however, any development will be required to provide 75% social rented homes.

There is a Council Plan commitment that commits us to guarantee developments on council housing land have at least 50% council rented homes and ensure a right to return for council tenants and resident leaseholders so local people can stay in the borough they call home.

Any planning applications for housing will be required to provide amenity and open space as set out in Policy 14 (residential quality of homes).

Reference to brownfield land has been removed.

The Aylesbury Area Vision Map was added to the New Southwark Plan which reflects the boundary in the Aylesbury Area Action Plan.

The council prioritises the delivery of council

<p>the council should commit to the NSP to provide “council homes”.</p>	<p>homes in the borough. We will continue our long-term homebuilding programme, delivering on our commitment to build 11,000 new council homes by 2043.</p>
<p>Organisation: Friends of Surrey Square Park NSPPSV407</p> <p>Aylesbury Area Vision</p> <p>Policy AV.x. 3 Growth opportunities in the Aylesbury Area</p> <p>Draft text in NSP states:</p> <p>“The Area Action Plan 2010 envisaged approximately 4,200 new homes with the provision of 50% affordable housing. The emerging direction of travel of planning policy seeks to optimise the potential of brownfield land. This suggests that it would now be appropriate to consider an increased number of homes for the Aylesbury area, with a view to moving towards replacing all the existing social rented homes in and in reasonable proximity to the original footprint of the estate. Irrespective of density, the objective of delivering 50% affordable housing should be met.” I support the provision of more social rented homes. We believe that the Council should commit in the NSP to providing COUNCIL HOMES, not just “social rented homes”, and that there should be like for like replacement of all Aylesbury council homes with council homes for rent.</p> <p>However, this section is poorly phrased, ambiguous and unclear.</p> <p>Council estates are not “brownfield land”. The use of the term “brownfield land” is pejorative, not descriptive. To make a relevant comparison, streets of privately-owned terraced houses in Dulwich, for example, would not be termed as “brownfield land”. The use of the term “brownfield” for the Aylesbury and adjacent council estates does not acknowledge the presence of current residents, undermines our right to occupy the land and makes the demolition of our homes more palatable to policy makers, and therefore more likely.</p> <p>It is not clear whether the “Aylesbury area” is the area bounded by the adopted AAAP Boundary Plan, or</p>	<p>The Aylesbury Area Action Plan and the New Southwark Plan set a requirement to deliver 50% social rented and intermediate homes in the Action Area (except in AAAP1 and AAAP4) of the approximate 4,200 planned for the Action Area. This 50% may not be all social rented homes due to financing as recognised in the AAP, however, any development will be required to provide 75% social rented homes.</p> <p>There is a Council Plan commitment that commits us to guarantee developments on council housing land have at least 50% council rented homes and ensure a right to return for council tenants and resident leaseholders so local people can stay in the borough they call home.</p> <p>Reference to brownfield land has been removed. The ‘Aylesbury area’ is defined in the vision map and refers to the Aylesbury Area Action Plan boundary, this has been amended in the vision.</p> <p>As acknowledged in the Aylesbury Area Action Plan, following studying the structural condition of the estate, the quality of the environment and the costs of refurbishment,</p>

something wider.

The “Aylesbury area” should be explicitly defined or stated to be that of the AAAP Boundary Plan. We are concerned that as this paragraph as phrased it will involve redevelopment of areas or estates beyond the adopted AAAP Boundary Plan. This is a possibility that has not been raised during the lengthy NSP consultation period, either generally or with nearby residents, including residents of the Rodney Estate, the Alvey Estate or the Kinglake Estate.

The NSP in this section has not been positively prepared.

The objectively assessed need for social rented housing in this area has not been sustainably met. There is no assessment of the sustainability of demolition of existing council homes on surrounding estates.

The NSP in this section is not justified.

There is no robust and credible evidence base to support the demolition or redevelopment of council homes surrounding the Aylesbury Estate. There has been no consultation on this option or any alternative option.

The NSP in this section is not effective.

The Plan for the provision of further social rented homes on so-called “brownfield land” is not clear or robust. The Plan is confusing and could have at least two different meanings. Either it could mean that all the Aylesbury homes could be delivered on the surrounding estates, or the homes on the surrounding estates could be demolished and new homes could be delivered there. This makes the Plan in this section unachievable.

Therefore, this part of the NSP is not positively prepared, is unjustified, unsound and ineffective.

This section should be deleted.

we concluded that it would cost too much to bring the homes up the decent homes standards. Therefore it was decided that the best way forward was to demolish the buildings and build a better place which would be much more attractive for people to live and work in. The redevelopment strategy for the estate was agreed in 2005.

Individual
NSPPSV408

The New Southwark Plan (NSP) is not legal because Southwark Council changed their consultation procedure mid-way through the consultation process unlawfully. There is a legitimate expectation that this round of consultation should be procedurally identical to previous rounds of consultation. The NSP is

The Aylesbury map in the NSP was changed to reflect the existing Area Action Plan boundary to ensure the map was accurate and therefore additional public consultation was not required.

not sound because the Aylesbury Area Vision Map has been modified mid-way during the consultation cycle - the first version includes more land to the west of Walworth Road. AV.x.3 Growth Opportunities in the Aylesbury Area.

The use of the term "brownfield land" within the Aylesbury area is ambiguous and unsound: council estates are not "brownfield land" and should not be treated as such. The use of the term "brownfield land" is pejorative, not descriptive. To make a relevant comparison, streets of privately-owned terraced houses in Dulwich, for example, would not be termed as "brownfield land". The use of the term "brownfield" for the Aylesbury and adjacent council estates does not acknowledge the presence of current residents, undermines our right to occupy the land and makes the demolition of our homes more palatable to policy makers, and therefore more likely.

In the phrase "...replacing all the existing social rented homes in and in reasonable proximity to the original footprint of the estate" it is not clear whether the 'Aylesbury area' is the area bounded by the adopted AAAP boundary Plan, or something wider. The 'Aylesbury area' should be explicitly defined or stated to be that of the AAAP Boundary Plan. There is particular concern that this paragraph, as phrased, will involve redevelopment of areas or estates beyond the adopted AAAP Boundary Plan. This is a possibility that has not been raised during the NSP consultation period, either generally or with nearby residents, including residents of the Rodney Estate, the Alvey Estate, or the Kinglake Estate.

The NSP in this section is not justified. There is no robust and credible evidence base to support the demolition or redevelopment of council homes surrounding the Aylesbury Estate. There has been no consultation on this option or any alternative option. This part of the NSP is not positively prepared, is unjustified, unsound and ineffective for the reasons stated above and should be deleted.

Organisation: University of Sheffield
NSPPSV410

Southwark unlawfully changed the consultation procedure midway through the consultation process. The AAV map was also modified mid-process, which requires a new consultation process. In these circumstances the NSP as put out for consultation cannot be considered sound.

The designation of 'brownfield' areas is also questionable. The designation of the Aylesbury area as 'brownfield' is not justified and does not take into account the current residents. It is unclear from planning documents and maps how the Aylesbury area is being defined by Southwark and this needs to be made clear for a legitimate consultation.

Reference to brownfield land has been removed. The 'Aylesbury area' is defined in the vision map and refers to the Aylesbury Area Action Plan boundary, this has been amended in the vision.

As acknowledged in the Aylesbury Area Action Plan, following studying the structural condition of the estate, the quality of the environment and the costs of refurbishment, we concluded that it would cost too much to bring the homes up to decent standards. Therefore it was decided that the best way forward was to demolish the buildings and build a better place which would be much more attractive for people to live and work in. The redevelopment strategy for the estate was agreed in 2005.

The Aylesbury map in the NSP was changed to reflect the existing Area Action Plan boundary to ensure the map was accurate and therefore additional public consultation was not required.

Reference to brownfield land has been removed. The 'Aylesbury area' is defined in

Residents must be sure how they will be affected by the proposed plan.
I am concerned about the provision for affordable housing. The 50% target for affordable housing does not engage with local needs and does not ensure no net loss of affordable housing.

There should be no demolition or redevelopment of homes surrounding the Aylesbury Estate and the Council has given no evidence to support this plan of action. Consultation has been poorly publicised and insufficiently carried out, with too little thought given to viable options or any alternative options. The section of the NSP relating to the Aylesbury area is not sound and does not represent an effective plan for the area.

the vision map and refers to the Aylesbury Area Action Plan boundary, this has been amended in the vision.

The Aylesbury Area Action Plan and the New Southwark Plan set a requirement to deliver 50% social rented and intermediate homes in the Action Area (except in AAAP1 and AAAP4) of the approximate 4,200 planned for the Action Area. This 50% may not be all social rented homes due to financing as recognised in the AAP, however, any development will be required to provide 75% social rented homes.

As acknowledged in the Aylesbury Area Action Plan, following studying the structural condition of the estate, the quality of the environment and the costs of refurbishment, we concluded that it would cost too much to bring the homes up the decent homes standards. Therefore it was decided that the best way forward was to demolish the buildings and build a better place which would be much more attractive for people to live and work in. The redevelopment strategy for the estate was agreed in 2005.

Organisation: Balfour Housing Street Project
NSPPSV173

We really need big change in areas like this to include smaller scale business accommodation in order to increase the chances of sustaining sufficient supply of such accommodation (strongest demand being for industrial of the type that can be made compatible with residential) to meet the needs of Southwark

We aim to deliver 500 new small affordable business spaces under policy SP4.

businesses who face an accommodation crisis.

Organisation: Friends of Burgess Park
NSPPSV62

The Aylesbury Vision is not positively prepared.

- Area Visions provide the strategic vision for the future of Southwark’s distinct places. Burgess Park is a distinct place and the indicative map of the Aylesbury Vision area includes Burgess Park but does not set out:
 - any opportunities for enhancements
 - public realm improvements
 - the relationship between the park and the proposed developments
 - any details on the aspiration for the Aylesbury area to be “stitched back” into the local area.
- The Aylesbury new developments and the relationship to Burgess Park is a key aspect of the distinctive nature of the area. The park occupies at least one third of the map presented alongside the Aylesbury Vision. The vision is unsound because it does not adequately address the relationship between the park and the new development.
- The Aylesbury Vision must also improve the Albany Road for pedestrians and cyclists, currently it is a fast route which is not suitable alongside a park.
- The Aylesbury Vision map for the area covered has changed from the AAP map. The Burgess Park Metropolitan Open Land boundary on the Aylesbury Vision map does not align with the MOL boundary shown in the new draft Southwark Plan. The increased density proposed for the Aylesbury Vision and the Old Kent Road Opportunity Area means that the MOL land must be maintained for Burgess Park. The Aylesbury Vision boundary does not need to match the MOL.
- The Aylesbury Vision should also define if any of the buildings will be landmark buildings within the context of Tall Buildings P14.

The Aylesbury Vision is not justified.

In the NSP this is an area vision and does not go into specific detail, including design. The Aylesbury Area Action Plan addresses opportunities for enhancements, public realm improvements etc.

Strategic SP5 sets out that we will seek to achieve a safer cycling network. The vision does acknowledge that development should include excellent cycling provision. In addition, any development will need to comply with Policy P52 (cycling).

As Metropolitan Open Land, development surrounding Burgess park will be guided by Policy P56 (open space), so this does not need to be repeated as P56 is an overarching policy covering all open space in the borough.

Any planning application for tall buildings will be assessed against all the relevant policies of the NSP, including Policy P16 (tall buildings). A number of policies within the NSP require high quality design in all types of development, these fall under the strategic policy SP2.

Any planning application for development near Burgess Park will be assessed against

- Amended Policy NSP P14: Tall buildings specifies buildings should have a positive relationship to the public realm; Burgess Park in this location. The policy is not justified because the impact of the proposed buildings for the north of Burgess Park must take into account the “emerging context” on the south side of the park. This has changed significantly since the Aylesbury AAP 2010 with the proposed developments of the Burgess Business Park site allocation in the new draft Southwark Plan with planned development along Parkhouse Street sites which run along the southside of the park.
- The character of Burgess Park will be substantially changed with 10-20 storey buildings along the majority of the boundary of the park, and even high potentially planned for the Aylesbury Vision site in order to increase density.
- The current Aylesbury AAP and the proposed plans for the area approved with outline planning permission make poor use of the opportunity of the position with unimaginative tall buildings along the park. These buildings cast substantial shadows onto the properties behind as pointed out in the officers report for planning permission. A more imaginative scheme could have overcome this issue and set back tall building from the park boundary – achieving better outcomes for the park and new residents in properties behind the towers currently planned along Albany Road.
- The draft Aylesbury Vision does not address the potential changes in the vision and set out a strategic vision which protects the current characteristics of Burgess Park which currently enjoys right to light, views of the sky and minimal shadowing of the park impeded by buildings. Building heights of upto 10 storeys would maintain the character of the park. There is no justification for increasing the heights of the towers along Albany Road, create a canyon effect with associated wind issues.
- The AAP is out of date and the council wishes to increase the density as suggested in the draft Vision, but not detailed. It is vital that there is a greater mix of types of dwellings, types of tenure, design style and inclusion of spaces which provide the opportunity for other things to happen. The mix on the other side of Walworth Road includes small industrial spaces (the railway arches) a number of small squares, parks and playgrounds. All of these need to be incorporated.
- The green fingers – originally a key part of the design idea have not been maintained. The design of Aylesbury must ensure plenty of new greenspaces open to all and in full sunlight are developed parallel to

Policy P55 (protection of amenity).

The Aylesbury Area Action Plan and the New Southwark Plan set a requirement to deliver 50% social rented and intermediate homes in the Action Area (except in AAAP1 and AAAP4) of the approximate 4,200 planned for the Action Area. This 50% may not be all social rented homes due to financing as recognised in the AAP, however, any development will be required to provide 75% social rented homes.

Policy P2 sets out the requirement for family homes this will ensure a mix of dwellings.

A number of policies in the Plan seek to protect heritage in the borough. This includes Policy P20 (conservation of the historic environment and natural heritage) which sets out that development must conserve and enhance the significance of the following heritage assets and their settings including registered parks.

Any planning applications for housing will be required to provide amenity and open space as set out in Policy 14 (residential quality of accommodation). The borough plans for leisure space for young people such as MUGAs and leisure space according to need.

Industrial development is not included in the vision for the site as a residential housing

new housing, with an understanding that these are an asset to people's health and wellbeing, not just places to demonstrate minimum outdoor space for play, a planter and a few trees. This will also contribute to providing quality greenspace in public/private spaces around the homes and take the pressure off the park. Development should stitch back into the surrounding context and enhance the ability for pedestrians and cyclists to get around a network of attractive tree-lined streets and public open spaces, with quality green space, arranged around a loose grid of well designed urban blocks and connect to existing and planned cycle routes linking the area into the surrounding neighbourhoods and transport nodes maximising the opportunity for cycle routes along the length of Albany Road.

Deliver excellent design that expresses timeless quality and variety, creating and contributing to the sense of different districts across the development area. Along Albany Road contributing to the setting immediately opposite to Burgess Park with high quality exemplary design minimising the environmental impact on the park with maximum 10 storeys and providing sunshine to the park and the properties behind Albany Road developments.

Provide general leisure space for young people, such a MUGA, and provide sports facilities (for sports and health) within leisure space/building/commercial offering and space for workshops, studios and workrooms, small depots and yards.

estate redevelopment and there is no industry being displaced by the redevelopment.

Individual
NSPPSV418

Do not consider the NSP AV.x Aylesbury Area Vision to be legal and sound because it does not comply with the National Planning Policy Framework and the London Plan or the Mayor's Good Practice Guide to Estate Regeneration (2018). There has been no consultation with residents, especially T&RAs about this new Area Vision. It was not included in the first NSP consultation in 2017 so there has been no time to properly consult residents. The Mayor's Good Practice Guide to Estate Regeneration (2018) states " As projects develop and change, and as alternative options are considered with residents, different approaches to consultation and engagement may become appropriate. Councils, housing associations and their partners should always be open to suggestions from residents and other stakeholders about developing more effective consultation and engagement mechanisms."

The council has failed in its duty to consult and engage with residents before making this Area Vision. This

Throughout the production of the New Southwark Plan, we have consulted the public in line with legal requirements and given residents the opportunity to comment on the Aylesbury Area Vision within the Amended Policies consultation.

The vision in the New Southwark Plan sits alongside the Area Action Plan.

is also going against Southwark's Charter of Principles.

The vision is not positively prepared as I do not understand if this vision replaces the whole AAAP or just the vision on pages 19 & 20 and Appendix 4 of the AAAP or whether it is replacing all of the AAAP.

The original AAAP is very clear and concise and was adopted to give clear guidance for the planning framework. It should not be changed until Aylesbury residents have been consulted on all options. The Aylesbury Vision should be deleted from the NSP.

AV.x. 1 The Aylesbury Area is: • A residential area located north of Burgess Park and between Walworth Road and Old Kent Road. It originally accommodated 2,750 homes and is characterised by large concrete slab buildings built in the mid 1960s – 70s, now at the end of their service life, which are set amongst mature trees.

I do not believe the buildings are, "at the end of their service life." There is no evidence to prove that. The council have now refurbished most of the buildings since the AAAP was adopted, costing leaseholders up to £16,000, with some work only being finished in the last few years. As there is now scope to keep the refurbished blocks there is a great need for more detailed consultation and involvement from the community as stated in Mayor's Good Practice Guide to Estate Regeneration (2018).

"Residents should be closely involved in shaping the priorities for estate regeneration and options for achieving these priorities. To achieve this, options appraisals should be open and transparent. They should:

a) Include the rationale, aims and objectives of the project in the context of: delivering better homes for local people; the landlord's strategic priorities; and neighbourhood, local, and London-wide planning and housing policies. b) Set out the factors that have informed the development of the proposed options, and how these have been prioritised and balanced. These factors might include: the existing characteristics and quality of an estate; the safety of existing buildings; the financial resources available; any regeneration or redevelopment plans that affect the wider area; and the wishes of residents and other stakeholders. c) Include technical and financial appraisals that have influenced any decisions on options. These should be available in an accessible format with non-technical summaries. d) Assess the full range of social, economic, and environmental costs and benefits of different options. This assessment might include: • any expected costs and savings resulting from changes in rents, service charges, energy bills and any other impacts on household expenditure; • the cost to residents' health of poor quality housing; • the financial cost to the landlord of maintaining existing homes to a reasonable standard (given the number of years for which doing so would be effective); • the number of other households who might not otherwise have a home, or a home of the right size for their needs, if the regeneration does not go ahead; and • the

As acknowledged in the Aylesbury Area Action Plan, following studying the structural condition of the estate, the quality of the environment and the costs of refurbishment, we concluded that it would cost too much to bring the homes up to the decent homes standards. Therefore it was decided that the best way forward was to demolish the buildings and build a better place which would be much more attractive for people to live and work in. The redevelopment strategy for the estate was agreed in 2005.

The AAP sets out that 'new community facilities, shops and business space focused on Thurlow Street, the Amersham site and East Street'. It also states 'if a health facility is not located on the Amersham site it can be accommodated on Thurlow Street or East Street'. It is the intention of the AAP to provide community facilities including a new health centre, library, pharmacy, café and a public square.

There is a Council Plan commitment that commits us to guarantee developments on council housing land have at least 50% council rented homes and ensure a right to return for council tenants and resident leaseholders so local people can stay in the borough they call home.

The 'Aylesbury area' is defined in the vision

cost of disruption to residents' lives for the duration of the project. e) Clearly set out any options that have been discounted as unviable or undeliverable, with a transparent explanation of why they are unviable or undeliverable. f) Set out what role residents and other stakeholders have played in developing and shaping options, and how the council or housing association and other agencies have supported them in doing so."

AV.x.2 Development of the Aylesbury Area should:

Establish a local hub in the vicinity of East Street and Thurlow Street with a range of community facilities including a new Health Centre, Library, pharmacy, café and a public square.

This is ambiguous. The AAAP states it was due to be in Site 10 (Amersham). Any new vision should give more clarity not less.

If the already refurbished block of Taplow, which currently houses the health centre and pharmacy then these 2 facilities do not need to be replaced, a Hub can be created at street level in Taplow at a lower cost. Additional affordable housing could then be built in the location of the planned new health centre along with the public square and community facilities such as a new youth centre. This was the original plan for the estate. The council have not consulted or justified their vision now that properties have been refurbished.

There has already been underground work to pipework and replacement boilers to the heating network for the current properties. There is therefore no mention of the energy centre or sustainability in this vision, which formed a large part of the AAAP 2010.

Be phased over a number of years to offer the maximum number of existing residents the opportunity to move into the new homes.

How is this going to happen? Phase 3 has already been activated so this is not a phased regeneration. Phase 4 are now choosing properties in Phase 1. This goes against the Mayor's Good Practice Guide to Estate Regeneration (2018), which aims to have only one move. Most residents which want to stay on the estate will have to have more than 1 move. This will disrupt thousands of people They have failed to plan any phasing correctly to minimize disruption to residents and leave residents in derelict areas. Safety is a

map and refers to the Aylesbury Area Action Plan boundary, this has been amended in the vision.

The Aylesbury map in the NSP was changed to reflect the existing Area Action Plan boundary to ensure the map was accurate and therefore additional public consultation was not required.

The Aylesbury Area Action Plan and the New Southwark Plan set a requirement to deliver 50% social rented and intermediate homes in the Action Area (except in AAAP1 and AAAP4) of the approximate 4,200 planned for the Action Area. This 50% may not be all social rented homes due to financing as recognised in the AAP, however, any development will be required to provide 75% social rented homes.

The redevelopment has taken time and residents have had the opportunity to comment on the proposals throughout the process.

key issue in the Mayor's Good Practice Guide to Estate Regeneration (2018).

AV.x. 3 Growth opportunities in the Aylesbury Area The Area Action Plan 2010 envisaged approximately 4,200 new homes with the provision of 50% affordable housing. The emerging direction of travel of planning policy seeks to optimise the potential of brownfield land. This suggests that it would now be appropriate to consider an increased number of homes for the Aylesbury area, with a view to moving towards replacing all the existing social rented homes in and in reasonable proximity to the original footprint of the estate. Irrespective of density, the objective of delivering 50% affordable housing should be met.

The phrase, "it would now be appropriate to consider an increased number of homes for the Aylesbury area, with a view to moving towards replacing all the existing social rented homes in and in reasonable proximity to the original footprint of the estate" is ambiguous. Clarity needs to be given as to where the increase is going to be and, "reasonable proximity to the original footprint of the estate." Are other estates and streets going to be affected? Residents in proximity of the estate have not been consulted so this should not be included.

"With a view to moving towards replacing all the existing social rented homes," needs to be consulted on. What are they being replaced with and at what rents? Will they be in accordance with the Mayor's Good Practice Guide to Estate Regeneration (2018) for affordable housing?

"Irrespective of density, the objective of delivering 50% affordable housing should be met." This is again ambiguous as the current planning permissions gives a lower density to Phase 3. This would give a net loss of social housing against the London Plan and The Mayor's Good Practice Guide to Estate Regeneration (2018).

The Aylesbury Area Vision Map was incorrect at the time of submission in January 2019.

Organisation: Vital OKR
NSPPSV205

We object to failure to include, in the Aylesbury Area Vision, a requirement that large predominantly residential developments include smaller scale workspace for which there is evidence of strong demand, and that can realistically be combined with residential, including workshop and light industrial, studio and workroom, storage. There is clear potential to incorporate such accommodation in major developments in

The Aylesbury Estate development is included in an adopted Area Action Plan and an adopted development masterplan. Much of the site has outline planning consent. The

<p>the AV.x area, in order to improve NSP soundness in relation to NPPF and London Plan requirements.</p> <p>The NSP PSV (with 2019 amendments) affords no clear protection to nearly two thirds of the borough’s industrial accommodation, and it neither requires sufficient re-provision through the process of redevelopment nor gives clear indication of the scale and geography of industrial intensification, co-location and substitution required in the borough. This dramatically conflicts with London Plan policy and disregards the requirements of the NPPF to meet objectively assessed needs. The combination of a proposed reduction to 45ha of designated industrial (SPIL and LSIS), the lack of new designations, the lack of policies requiring provision of smaller scale workspace in large predominantly residential developments (such as are proposed within the AV.x area), and the lack of policies clearly requiring retention or re-provision of industrial space on sites where it currently exists (if re-developed), would result in a scale of net industrial accommodation loss allowed by the NSP PSV (with amendments), even optimistically assuming that no net loss on LSIS (as London Plan policy) was achieved, of 77ha, which is 64% of the current borough total. Thus the NSP does not accord with the draft London Plan Policy E4 para C that places Southwark in the 'retain capacity' category.</p> <p>The Aylesbury Action area is one of the 13 site allocations relating to areas not currently including industrial uses, to which we have previously made representations (Feb 2018) objecting to the failure to define any requirement for industrial accommodation within mixed-development where there is clear potential to incorporate use including industrial. Such accommodation provision would be an important contributor to meeting the industrial no net loss objective set out in the draft London Plan, and would accord with other policy such as London Plan para 6.3.4 which states that the Mayor encourages the delivery of new workspace for SMEs, the creative industries, artists and the fashion industry within new residential and mixed-use developments. In order to improve NSP soundness in relation to NPPF and London Plan requirements we suggest revision of the policy.</p>	<p>priority for the Aylesbury Estate is to redevelop to provide new homes including 50% affordable housing. Industrial development is not included in the vision for the site as a residential housing estate redevelopment and there is no industry being displaced by the redevelopment.</p> <p>As set out in the AAP about 2,500sqm of employment floorspace will be located at the junction of Thurlow Street and East Street.</p>
<p>Individual NSPPSV393</p> <p>The Aylesbury Area Vision Map was modified during the consultation period. As a result the plan is unsound. We need more council homes.</p>	<p>The Aylesbury Area Vision Map was added to the New Southwark Plan which reflects the boundary in the Aylesbury Area Action Plan.</p> <p>The council prioritises the delivery of council homes in the borough. We will continue our</p>

long-term homebuilding programme,
delivering on our commitment to build 11,000
new council homes by 2043.