

Representation	Officer Response
<p>P11 Design of Places</p>	
<p>Individual NSPPSV07.5</p> <p>5. P11 - Design of place. This policy is unsound because it does not take into account evidence about the adverse effects of tall buildings on existing residents and neighbourhoods. Nor does it suggest how these adverse effects could be remediated if tall buildings are to be built. This could be improved by addressing this evidence and included appropriate guidelines for remediation.</p>	<p>Representation has been noted. P11 does acknowledge impacts of tall buildings through providing guidance to developers on the aspirations of all areas in Southwark. This is covered in point 1.1 of P11. The relevant policy that takes into account the detailed adverse impacts of tall buildings and provides mitigation is P14.</p>
<p>Organisation: Bankside Residents Forum NSPPSV19.9</p> <p>"This policy is not sound. Placemaking can take time and effort, while developers simply want to build and see a return on investment. The bullet points in this policy while commendable as part of a toolkit for developers, do not necessarily carry much weight in the design of places, nor do they make the policy sound when it comes to making planning decisions. Given the plethora of decisions resulting buildings that are out of character with their site locations, such a policy needs to learn from the lessons of countless examples of developments that have created wind shear, over shadowing, light reduction, actually reduced permeability, and created congestion.</p> <p>We would have like to have seen more emphasis on existing borough strategy documents such as the Bankside Urban Forest Framework, and how the local authority will encourage developers and their architects to implement the Mayor's six pillars of the Good Growth by Design programme:</p> <p>1 SETTING STANDARDS Using design inquiries to investigate key issues for architecture, urban design and place-shaping, in order to set clear policies and standards.</p> <p>2 APPLYING THE STANDARDS</p>	<p>The NSP is a document of strategic policies that sets guidance on the aspiration of major development for new homes, social, green and transport infrastructure in the Borough. Representation has been acknowledged, but due to the initial point further policies on how developers should implement and execute contributions to the Boroughs place making plan would not be appropriate in this specific document. Through P11 guidance on the positive additions that are welcomed into the vision of place making are set out, but to ensure negative impacts are mitigated where relevant this document and its policies must be read as a whole.</p> <p>It should be noted that this policy has been amended to include housing that provides accommodation and support for vulnerable people. The 'reasons' section provides more detail of vulnerable people, however, this list is not exhaustive. Any planning application for supported accommodation will be assessed accordingly and considered on its own merit.</p> <p>Monitoring of housing is undertaken by the council. This includes</p>

<p>Ensuring effective design review</p> <p><b>3 BUILDING CAPACITY</b> The boroughs' ability to shape new development to deliver good growth.</p> <p><b>4 SUPPORTING DIVERSITY</b> Working towards a more representative sector and striving for best practice while designing for diversity.</p> <p><b>5 COMMISSIONING QUALITY</b> Ensuring excellence in how public sector clients appoint and manage architects and other built environment professionals.</p> <p><b>6 CHAMPIONING GOOD GROWTH BY DESIGN</b> Advocating best practice to support success across the sector. "</p>	<p>affordable housing and non-conventional housing. Monitoring data and results will be published in the Annual Monitoring Report as set out in Policy IP5: monitoring development.</p>
<p>Organisation: Better Bankside NSPPSV22.5</p> <p>"The NSP's stance on public realm matters is detailed further within Policy P11, expanding on how development proposals must follow some key urban design principles.</p> <p>Better Bankside welcomes the inclusion of urban design considerations within the Plan and encourage a design policy that ensures development proposals reflect their impacts on the public realm and are shaped by the functionality of the development to the wider street. Moreover, designs should incorporate strategies that seek to make improvements to the surrounding environment in which they are located and be attentive to the local character.</p> <p>Given the large amount of business activity within the Borough, we believe the policy should make specific reference as to how development proposals will add to the existing uses within the area. The last point of the policy specifies outdoor seating and public realm improvements for residents and visitors. However, we suggest that the</p>	<p>Supportive representation of P11 has been acknowledged, however it should be noted that further commentary on business activity in this policy is not required. This is due to P11 providing guidance to developers on the aspirations of all areas in Southwark, which is inclusive of business environments.</p>

<p>policy should also include an appreciation of how the urban realm can serve local businesses. "</p>	
<p>Organisation: Capital Industrial NSPPSV30.3</p> <p>The policy requires all development to comply with the requirements set out in the policy. The requirements include the provision of adequate outdoor seating (as part of public realm) for residents and visitors (criterion 1.9). We consider that this is an onerous and inappropriate requirement, depending on the scale and nature of development. We therefore object to criterion 1.9 and consider that it should be removed from the policy to ensure that regeneration sites will not be burdened by a policy requirement which has not been justified as necessary or appropriate for all developments.</p>	<p>Representation noted. Policy will not be removing point 1.9 as the purpose of P11 is to provide guidance to developers on the aspirations of all areas in Southwark, which is inclusive of guidance on the positive additions that are welcomed into the vision of place making in the Borough. Therefore it is considered essentially necessary to keep point 1.9 in order to fulfil the vision and the purpose of P11.</p>
<p>Individual NSPPSV40.8</p> <p>"These policies are not effective because they do not satisfy the needs of the myriad communities in Southwark.</p> <p>The current prescriptive way in which places, spaces and homes are designed and delivered, does not take into account the needs of the myriad different cultural activities and ethnically diverse communities in Southwark, where the borough's provisions are inadequate. There needs to be a completely new way of looking at the way we socialise and the accommodation thereof. This is also relevant to SP2 Social Regeneration as the provision of social spaces is essential efficient social regeneration.</p> <p>The lack of free community spaces with kitchen provisions, where it is safe for children and where people can meet and share sustenance, is having a devastating effect on our society. There are increasing numbers of disconnected and disenfranchised individuals and families unable to cope. Since 2007-8 in Southwark, there has been an upward trend in the suicide rate, which over the period 2013-15 was higher than the national average.</p>	<p>Representation noted. P11 representation is acknowledged, and we will reflect in the reasons the need to address the design of places for the diverse communities in Southwark.</p>

<p>There is a failure to require larger predominantly residential developments to include smaller scale workspace for which there is a strong demand and that can be realistically combined with residential, including office, workshop and light industrial, studio and workroom storage. Also there is a failure to give clarity on policy about workspaces in combination with, or ancillary to, residential.</p> <p>I would like to give more details in my further statement in advance of the oral examination."</p>	
<p>Organisation: Historic England NSPPSV83.4</p> <p>"We offer some comments in relation policy P14 Tall Buildings and to a number of site allocations policies below. We note that indicative capacities for the site allocations have been removed in this iteration of the Plan, and we consider this to be helpful in terms of being able to ensure that detailed proposals for each site are not constrained by overly prescriptive policy and therefore better able to respond to context. However, this also means that it becomes increasingly important to ensure that the text in relevant supporting policies is robust and able to deliver the overarching objectives of the Plan – including the conservation and enhancement of the historic environment.</p> <p>To help address this, we therefore recommend some amendments to policies P11 (Design of Places) and P12 (Design Quality).</p> <p>P11, 1.2 'Better reveal local distinctiveness and architectural character, and conserve and enhance the significance of the local historic environment'."</p>	<p>Minor amendments have been acknowledged and will be updated in P11 of the NSP.</p>
<p>Individual NSPPSV87.6</p> <p>6. P11 - Design of place. This policy is unsound because it does not take into account evidence about the adverse effects of tall buildings on existing residents and neighbourhoods. Nor does it suggest how these adverse effects could be remediated if tall buildings are to be built. This could be improved by addressing this evidence and included appropriate guidelines for remediation.</p>	<p>Representation has been noted. P11 does acknowledge impacts of tall buildings through providing guidance to developers on the aspirations of all areas in Southwark. This is covered in point 1.1 of P11. The relevant policy that takes into account the detailed adverse impacts of tall buildings and provides mitigation is P14.</p>

<p>Individual NSPPSV110.6</p> <p>"Social regeneration to revitalise neighbourhoods</p> <p>Policy P11 (Design of place) is unsound because it is not effective. The policy states that development must ensure height, scale, massing and arrangement must respond positively to existing townscape, character and context, and reveal local distinctiveness. Development must also provide landscaping that is appropriate to the context and use green infrastructure. Importantly, it notes research in the borough that shows 'the character of feel of neighbourhoods influences community cohesion and social interaction'. Yet the principles of P11 have been ignored and there is a discrepancy between the policy stated here and the Peckham Area Vision detailed later in the document. If the Area Vision is adopted, then this policy is not effective. "</p>	<p>The purpose of P11 is to provide guidance to developers on the aspirations of all areas in Southwark, which is inclusive of guidance on the positive additions that are welcomed into the vision of place making in the Borough. To ensure negative impacts are mitigated where relevant this document and its policies must be read as a whole alongside the area visions.</p>
<p>Organisation: Peckham Society NSPPSV140.5</p> <p>"Development must:</p> <p>. 1.1 Ensure height, scale, massing and arrangement respond positively to the existing townscape, character and context; positively to...' is ambiguous, and would be better stated as 'respect' "</p>	<p>Representation acknowledged, however it should be noted that amendments to point 1.1 of P11 is not required as the proposed suggestion is just as effective the current wording.</p>
<p>Organisation: Port of London Authority NSPPSV143.2</p> <p>"2. Policy P11: Design of Places</p> <p>The PLA broadly support this policy, which aims to ensure that the principles of urban design are taken into consideration when designing new development. Is there any further detailed information available on the referenced water sensitive design within the policy? Can this be made available to the PLA? "</p>	<p>Supportive representation of P11 has been noted. It should be acknowledged that the reference to water sensitive urban design is not a document, but in fact a design concept that we anticipate developers to aspire to.</p>

<p>Individual NSPPSV151.7</p> <p>"P11 It is appropriate to ensure that the design of new development seeks to improve the environment. As currently worded the draft is too prescriptive in aiming to achieve this objective. Word such as 'must' should be replaced by 'should aim to' or similar. Also, what is and who defines 'local distinctiveness'?</p> <p>Delete the word 'must' "</p>	<p>Minor amendment to P11 has been acknowledged, but it is not considered necessary to replace the word 'must' as developers would need to fulfil these requirements set out in this policy. Further to this all word definitions for the NSP can be found in the glossary set out as an appendix.</p>
<p>Organisation: Southwark Cyclists NSPPSV164.6</p> <p>"P11: Design of Places Not consistent The draft NLP and MTS stress the need to make driving less attractive to reduce private motor vehicle travel. By contrast this policy calls for the movement of vehicular traffic to be eased. To make the policy sound, add a reference to ' the Mayor's Healthy Streets Approach ' and remove the words 'and vehicular traffic.' "</p>	<p>Representation has been noted. Point 1.5 does not encourage vehicular traffic, however the policy does indeed call for vehicular movement to be eased in line with Policy 5 of the MTS and policy D7 public realm of the London Plan.</p>
<p>Organisation: Southwark Friends of the Earth NSPPSV165.2</p> <p>"P11- Design of Places:- We support all these points, but we believe they should all apply across the borough as much as possible and within all new developments, all to scale, no huge differences to create a graph-style street scape, e.g. Strata Tower and 3-4 floor building sandwiched only to be overshadowed by Draper House."</p>	<p>Through P11 guidance on the positive additions that are welcomed into the vision of place making are set out for the Borough, but to ensure negative impacts are mitigated where relevant this document and its policies must be read as a whole.</p>
<p>Organisation: TfL Commercial Development NSPPSV182.8</p> <p>Similarly, paragraph 1.1 should also include reference to a site's connectivity and</p>	<p>Representation acknowledged, however amendments to point 1.1</p>

accessibility by walking and cycling, and existing and planned public transport (including PTAL), as one of the considerations to which height, scale and massing should respond. This would accord with the DLP approach to optimising housing delivery in the most accessible locations, particularly at and close to stations and other transport hubs.

Individual  
NSPPSV322.5

"new London Plan Policy D8

""Tall buildings have a role to play in helping London accommodate its expected growth as well as supporting legibility across the city to enable people to navigate to key destinations. To ensure tall buildings are sustainably developed in appropriate locations, and are of the required design quality, Development Plans and development proposals must undertake the following:

#### Definition

Based on local context, Development Plans should define what is considered a tall building, the height of which may vary in different parts of London.""

Tall buildings therefore require statements to indicate clearly to developers the maximum acceptable heights and massing on sites that would conform to the policy. Such information should be clear and legally enforceable.

In Copenhagen Denmark there are clear unambiguous maps produced to enable applicants to achieve compliance with legal requirements for development sites. It is not difficult to do, but would save a great deal of legal time spent wrangling over points that a good sound plan ought to spell out to all.

A map giving clarity on ownership, site boundaries, maximum heights and the overall massing that are the outermost acceptable limits, based on sound town planning principles and respecting the advice already accepted by the Southwark Council in the Conservation Area character assessment already undertaken by the Southwark Council." Representation has been noted. P11 does acknowledge impacts of tall

to cover accessibility by walking and cycling is not required as point 1.3 of P11 talks about new development paying regard to the existing area when proposing new movement infrastructure.

Representation has been noted. P11 does acknowledge impacts of tall buildings through providing guidance to developers on the aspirations of all areas in Southwark. This is covered in point 1.1 of P11. The relevant policy that takes into account the detailed adverse impacts of tall buildings provides mitigation and aims to comply with the New London Plan policy D8 is NSP policy P14.

buildings through providing guidance to developers on the aspirations of all areas in Southwark. This is covered in point 1.1 of P11. The relevant policy that takes into account the detailed adverse impacts of tall buildings provides mitigation and aims to comply with the New London Plan policy D8 is NSP policy P14.

<p>Organisation: TfL Commercial Development NSPPSV18.2</p> <p>Paragraph 1.1 should also include reference to a site’s connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL), as one of the considerations to which height, scale and massing should respond. This would accord with the DLP approach to optimising housing delivery in the most accessible locations, particularly at and close to stations and other transport hubs.</p>	<p>Representation acknowledged, however amendments to point 1.1 to cover accessibility by walking and cycling is not required as point 1.5 of Policy P13 (design of places) requires new development to ensure high quality public realm that encourages walking and cycling.</p> <p>Connectivity and accessibility are included in many of the policies and PTAL has been taken into consideration within the Tall Buildings policy and efficient use of land.</p>
<p><b>Representation</b></p>	<p><b>Officer Response</b></p>
<p>P12 Design Quality</p> <p>Individual NSPPSV18.7</p> <p>Policy P12 requires new development to provide adequate daylight, sunlight outlook and a comfortable microclimate for new and existing neighbouring occupiers.</p> <p>It should be noted that the level of amenity will vary as density increases and therefore the Council cannot expect this to be consistent at a Borough wide level. All development should target compliance with the BRE guidelines where possible.</p> <p>The characteristics of an area will dictate what should be considered as ‘appropriate’ and this should be picked up within the justification</p>	<p>Representation noted. P12 states that Southwark has a range of different neighbourhoods and areas contributing to local distinctiveness, and this diversity will be reflected in new development. It is important that the NSP is read as a whole. P11 Design of Places states that development must ensure the urban grain and site layout take account of and improve existing patterns of development and movement, permeability and street widths. Additionally, P54 Protection of amenity addresses the need for the amenity of those living, working in or visiting Southwark to be protected.</p>
<p>Organisation: Bankside Residents Forum NSPPSV19.10</p> <p>This policy is not positively prepared. We would have like to see an emphasis not just on the provisions placed on developments, but on how such design qualities</p>	<p>Representation has been acknowledged, but due to the NSP being a document of strategic policies that sets guidance on the</p>

complements and fits in to the spatial planning needs of an area.

Again, we would have like to have seen more emphasis on how the local authority will encourage developers and their architects to implement the Mayor's six pillars of the Good Growth by Design programme:

#### 1 SETTING STANDARDS

Using design inquiries to investigate key issues for architecture, urban design and place-shaping, in order to set clear policies and standards.

#### 2 APPLYING THE STANDARDS

Ensuring effective design review

#### 3 BUILDING CAPACITY

The boroughs' ability to shape new development to deliver good growth.

#### 4 SUPPORTING DIVERSITY

Working towards a more representative sector and striving for best practice while designing for diversity.

#### 5 COMMISSIONING QUALITY

Ensuring excellence in how public sector clients appoint and manage architects and other built environment professionals.

#### 6 CHAMPIONING GOOD GROWTH BY DESIGN

Advocating best practice to support success across the sector.

Where P12 states that there are many provisions a development needs to show that it has design quality, there is no actual guidance on how to actually achieve such design quality, even though similar guidance has just been produced around Southwark's Streetscape Design.

aspiration of major development for new homes, social, green and transport infrastructure in the Borough. Policy requirements for P12 will not be amended to state how developers must achieve the required design qualities through spatial planning as this is demonstrated in the reasons section of P12. Further guidance on how to achieve design quality is reflected in our SPD guidance papers.

It should be noted that this policy has been amended to include housing that provides accommodation and support for vulnerable people. The 'reasons' section provides more detail of vulnerable people, however, this list is not exhaustive. Any planning application for supported accommodation will be assessed accordingly and considered on its own merit.

Monitoring of housing is undertaken by the Council. This includes affordable housing and non-conventional housing. Monitoring data and results will be published in the Annual Monitoring Report as set out in Policy IP5: monitoring development.

Individual  
NSPPSV40.9

These policies are not effective because they do not satisfy the needs of the myriad communities in Southwark.

The current prescriptive way in which places, spaces and homes are designed and delivered, does not take into account the needs of the myriad different cultural activities and ethnically diverse communities in Southwark, where the borough's provisions are inadequate. There needs to be a completely new way of looking at the way we socialise and the accommodation thereof. This is also relevant to SP2 Social Regeneration as the provision of social spaces is essential efficient social regeneration.

The lack of free community spaces with kitchen provisions, where it is safe for children and where people can meet and share sustenance, is having a devastating effect on our society. There are increasing numbers of disconnected and disenfranchised individuals and families unable to cope. Since 2007-8 in Southwark, there has been an upward trend in the suicide rate, which over the period 2013-15 was higher than the national average.

There is a failure to require larger predominantly residential developments to include smaller scale workspace for which there is a strong demand and that can be realistically combined with residential, including office, workshop and light industrial, studio and workroom storage. Also there is a failure to give clarity on policy about workspaces in combination with, or ancillary to, residential.

I would like to give more details in my further statement in advance of the oral examination.

Organisation: GPE (St Thomas Street)  
NSPPSV67.2

This policy requirement for all developments to provide high standards of design is

Through P11 guidance on the positive additions that are welcomed into the vision of place making are set out for the Borough, but to ensure negative impacts are mitigated where relevant this document and its policies must be read as a whole. NSP P54: Protection of Amenity recognises that "Developments should be permitted when it does not cause an unacceptable loss of amenity to present or future occupiers or users.

Support noted.

<p>welcomed and will ensure regeneration in Southwark positively contributes to the creation of a high class urban environment.</p>	
<p>Organisation: Historic England NSPPSV83.5</p> <p>We offer some comments in relation policy P14 Tall Buildings and to a number of site allocations policies below. We note that indicative capacities for the site allocations have been removed in this iteration of the Plan, and we consider this to be helpful in terms of being able to ensure that detailed proposals for each site are not constrained by overly prescriptive policy and therefore better able to respond to context. However, this also means that it becomes increasingly important to ensure that the text in relevant supporting policies is robust and able to deliver the overarching objectives of the Plan – including the conservation and enhancement of the historic environment.</p> <p>To help address this, we therefore recommend some amendments to policies P11 (Design of Places) and P12 (Design Quality).</p> <p>P12, 1.2 ‘Innovative design solutions that address the site’s historic context, topography and constraints, including the significance of relevant heritage assets</p>	<p>The NSP Proposed Submission Version does not include indicative development capacities for each Site Allocation because the purpose of the Site Allocation is not to provide a detailed design brief for each site. However, The New Southwark Plan Evidence Base: Site Allocations Methodology Report contains indicative development capacities for the site allocations in the NSP, and borough-scale aggregated figures. It is important that the NSP is read as a whole, a number of policies in this document address development's responsibility in regard to heritage assets. P16 Listed Buildings and Structures, P17 Conservation Areas, and P18 Conservation of Historic environment and natural heritage.</p>
<p>Organisation: Dulwich Society NSPPSV119.1</p> <p>I write as a member of the Dulwich Society. My comments relate to the Development Management Policies covering aspects of the historic environment.</p> <p>At the outset, I am bound to suggest that the Plan is basically unsound because it fails to take on the emerging policies and proposals contained in the Draft London Plan. This is a matter of timing, and in no sense represents an error of judgement on the part of Southwark. Ideally therefore, we suggest that the Plan be withdrawn pending the outcome of the EIP into the London Plan. Failure to do so, will mean that the Plan will subsequently require substantial amendment, because the approach adopted in the</p>	<p>Representation noted. The NSP has been prepared to ensure that guidance is sound and complies with the NPPF &amp; London Plan. Amendments have been made throughout the plan preparing process to ensure guidance is update and compliant with the draft New London Plan. Point 1.5 requires that development must buildings and spaces which are constructed and designed sustainably. A point will be added to the last paragraph of the reasons regarding the adaptive reuse/ retrofitting of existing buildings.</p>

new London Plan differs markedly from that of its predecessor.

The Society's comments on the Development Management policies are as follows:

P12 Design quality.

Add to 1.2. It is important to note that sustainable design should include the adaptive re-use of existing buildings, recognising the embodied energy invested in historic fabric.

Individual  
NSPPSV125.3

#### New Southwark Plan

Draft Future Steering Board Response to Proposed Submission Version Feb 2018

#### Background

The Southwark Future Steering Board (FSB) is a consultative body with membership drawn from the Council's Tenants Council, and Home Ownership Council. The terms of reference of the FSB set out its role to provide a formal, resident-led mechanism to work with Southwark Council on its Asset Management, New Build Homes and investment plan. The FSB has considered and commented on 2 previous drafts of the New Southwark Plan. These are the comments of the FSB on the Submission Draft of the New Southwark Plan in February 2018.

#### P9 Optimising Delivery of New Homes.

Density is related to PTAL. Public transport is provided where there are people. This is a circular relationship which means that where there is more population density, more public transport is provided, and then the planning process requires more density in new development. This means that density gets concentrated in areas with existing dense population. The New Southwark Plan reflects this, with lower densities, and no

The amended Policy P14 states that some of the site allocations have identified possible sites for tall buildings in Peckham and Camberwell taking into account conservation areas and other heritage assets. This policy states that tall buildings must not cause a harmful impact on strategic views, as set of in the London View Management Framework, or to our Borough views. This policy also states that the design of tall buildings will be required to avoid harmful and uncomfortable environmental impacts including wind shear, overshadowing and solar glare.

<p>areas zoned as opportunity areas in the South of the borough. This is despite the provision of railway stations at East Dulwich, North Dulwich and West Dulwich and nearby railway stations at Denmark Hill, Herne Hill, Tulse Hill and Sydenham Hill. The plan could more evenly distribute new residential development to take advantage of these railway stations.</p> <p>Wind Tunnel Effects</p> <p>The increase in tall buildings in some areas of the borough has increased the wind shear effect. This particularly affects pedestrians and cyclists. Tall buildings are zoned in areas where there is an expectation of high street development. In the sections on Design Quality (p.39) and Tall Buildings (p.42) there is mention of; 'reduce...adverse local climatic conditions (e.g. wind shear)', and ;'Avoid harmful and uncomfortable environmental impacts including wind shear'. There is no mention of what standards will be applied to achieve this. The NSP needs to identify the relevant standards that these policies will be measured against, or explain how such standards will be developed. Wind shear not only has an impact on pedestrian and cyclists safety, but also has an impact on the 'pedestrian experience', and can be a contributory factor in the spread and intensity of fires.</p>	
<p>Organisation: Peckham Society NSPPSV140.4</p> <p>Design Quality 'Southwark has some world class developments' Suggest add examples</p>	<p>The policy provides sufficient clarity and the addition of examples of world class developments is not necessary.</p>
<p>Individual NSPPSV151.8</p> <p>P12</p> <p>As for draft policy p11, the current wording includes words such as 'must' and is to prescriptive. What or who determines a 'comfortable' microclimate? Delete the word 'must'.</p>	<p>Representation noted. The NPPF requires Local Plans to be positively prepared; as such the policy will not be amended to remove the word 'must'. Further guidance on how to achieve design quality is reflected in our SPD guidance papers.</p>
<p>Organisation: Southwark Cyclists</p>	

<p>NSPPSV164.7</p> <p>P12: Design Quality Not consistent The draft NLP and MTS stress the need to design streets to be adaptable and improve public realm. PPG Reference ID: 26-001-20140306 requires design to be adaptable and this is especially important for public realm in Southwark due to expected increases in walking and cycling over the lifetime of developments. To make the policy sound a reference to adaptability is required In addition a new policy is needed for the public realm to comply with the requirements of the draft NLP.</p>	<p>P11 is the policy area that addresses the design of streets and the public realm therefore a new policy to address the public realm is not required.</p>
<p>Organisation: TfL City Planning NSPPSV181.2</p> <p>Suggested change to line 1.10 A positive pedestrian and, where appropriate, cycling experience; Particularly in areas that have larger development sites (such as Canada Water and Old Kent Road), exemplar cycle facilities, and ease of access for cyclists, will be vital to support the Mayor's mode shift targets towards more active travel.</p>	<p>Representation noted. Policy P50 (walking) states that development must enhance the borough's walking networks by providing footways, routes and public realm that enable access through development site and adjoining areas. Policy P52 (Cycling) ensures the delivery of the Southwark Spine cycle route and the wider cycling route network.</p>
<p>Organisation: TH Real Estate NSPPSV183.5</p> <p>The policy refers to the promotion of good design as a key aspect of making places better for people. With regard to new development, criterion 1.8 of the draft policy</p>	<p>Representation has been acknowledged.</p>

<p>refers to the provision of “adequate servicing within the footprint of the building and site for each land use.”</p> <p>It will be important that flexibility is given to servicing arrangements on all redevelopment sites that incorporate a mix of uses. The potential for shared servicing arrangements between different land uses should be considered to not only seek to minimise vehicle movements, but also allow for the best use of development sites, (such as site NSP83), to come forward to meet other land use objectives of the Plan.</p>	
<p><b>Representation</b></p>	<p><b>Officer Response</b></p>
<p>P15 Efficient use of land</p>	
<p>Organisation: <b>Bankside Residents NSPPSV19.12</b></p> <p>The inclusion of meanwhile uses shows that the P15 has not been positively prepared. Meanwhile uses while they can offer community benefits and not compromise a sites future redevelopment does not mean that they can still be inappropriate. Uses of land for say A3 and A4 classes often bring with them anti-social behaviour or impact on neighbourhood in a detrimental way.</p> <p>The reasons provided in P15 bullet 2 do not in any way relate to the environment of Bankside, nor would the neighbourhood lose any of its vitality. There is a need to clarify this vague bullet point.</p>	<p>Representation noted. Meanwhile uses can deliver community benefits, keep areas vibrant and provide affordable space for entrepreneurs and local residents. The NSP is a document of strategic policies that sets guidance on the aspiration of major development for new homes, social, green and transport infrastructure in the Borough.</p>
<p>Individual <b>NSPPSV91.75</b></p> <p>P15: Efficient use of land Objection 57.</p>	<p>Representation noted. This policy does not preclude the ability of smaller scale non-residential development to increase density,</p>

We object to to failure to make clear that this policy will promote smaller scale non-residential development wherever they comply with points 1.1 and 1.2. We suggest adding a point 3 stating that development should be permitted for smaller scale non-residential uses (below the sequential test thresholds) wherever they satisfy 1.1 and 1.2. It should be explained in the Reasons text that there is significant scope for small scale expansion of non-residential development outside of the CAZ, town centres, designated industrial land and allocated sites, and that these can help restore the filigree of premises suitable for such as light industry, studio uses and office use, community uses, niche and local serving retail.

NPPF para 14 requires Local Plans to meet objectively assessed needs. NPPF para 154 states that Local Plans should set out clear policies on what will or will not be permitted and where.

NPPF para 6 requires the planning system to contribute to the achievement of sustainable development, including through an economic role, contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements.

London Plan para 6.3.4 states that The Mayor will encourage the delivery of new workspace for SMEs, the creative industries, artists and the fashion industry within new residential and mixed-use developments. He will also provide assistance to artists and creative businesses through the Mayor's Creative Enterprise Zones and promote schemes that provide linked affordable housing and business space in new housing developments.

provided that points 1.1 and 1.2 are satisfied. The policy also recognises the harmful impact that densities which are too high can have on the environment and quality of life. The NSP is a document of strategic policies that sets guidance on the aspiration of major development for new homes, social, green and transport infrastructure in the Borough.

we strongly support draft Policy P15 Efficient Use of Land which states:  
Development will be permitted that maximises the efficient use of land where:  
- The development does not reasonably compromise development potential or legitimate activities on neighbouring sites; and  
- Adequate servicing facilities, circulation spaces and access to, from and through the site is provided.  
- Development should be permitted for appropriate 'meanwhile uses' where they deliver community benefits and do not compromise the future redevelopment of the site.  
I trust these comments will be taken into consideration in the preparation of the forthcoming Local Plan submission to the Secretary of State. If in the interim you have any queries, please do not hesitate to contact me.

Supportive representation of P15 is acknowledged.

Individual  
NSPPSV128.75

P15: Efficient use of land  
Objection 57.  
We object to failure to make clear that this policy will promote smaller scale non-residential development wherever they comply with points 1.1 and 1.2. We suggest adding a point 3 stating that development should be permitted for smaller scale non-residential uses (below the sequential test thresholds) wherever they satisfy 1.1 and 1.2. It should be explained in the Reasons text that there is significant scope for small scale expansion of non-residential development outside of the CAZ, town centres, designated industrial land and allocated sites, and that these can help restore the filigree of premises suitable for such as light industry, studio uses and office use, community uses, niche and local serving retail.

Representation noted. This policy does not preclude the ability of smaller scale non-residential development to increase density, provided that points 1.1 and 1.2 are satisfied. The policy also recognises the harmful impact that densities which are too high can have on the environment and quality of life.

NPPF para 14 requires Local Plans to meet objectively assessed needs.

<p>NPPF para 154 states that Local Plans should set out clear policies on what will or will not be permitted and where.</p> <p>NPPF para 6 requires the planning system to contribute to the achievement of sustainable development, including through an economic role, contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements.</p> <p>London Plan para 6.3.4 states that The Mayor will encourage the delivery of new workspace for SMEs, the creative industries, artists and the fashion industry within new residential and mixed-use developments. He will also provide assistance to artists and creative businesses through the Mayor’s Creative Enterprise Zones and promote schemes that provide linked affordable housing and business space in new housing developments.</p>	
<p>Organisation: Space Studios NSPPSV169.08</p> <p>Regarding Social regeneration to revitalise neighbourhoods policy P15: Efficient use of land we object to failure to make clear that this policy will promote smaller scale non-residential development wherever they comply with points 1.1 and 1.2.</p>	<p>Representation noted. This policy does not preclude the ability of smaller scale non-residential development to increase density, provided that points 1.1 and 1.2 are satisfied. The policy also recognises the harmful impact that densities which are too high can have on the environment and quality of life.</p>
<p>Organisation: Studio Makecreate NSPPSV175.13</p> <p>13.</p> <p>Regarding Social regeneration to revitalise neighbourhoods policy P15: Efficient use of land we object to failure to make clear that this policy will promote smaller scale non-residential development wherever they comply with points 1.1 and 1.2.</p>	<p>Representation noted. This policy does not preclude the ability of smaller scale non-residential development to increase density, provided that points 1.1 and 1.2 are satisfied. The policy also recognises the harmful impact that densities which are too high can have on the environment and quality of life.</p>

This inadequacy makes the plan unsound as it is not justified, nor is it consistent with national policy, each in the ways required by the NPPF. These failures also make the plan unsound in relation to the London Plan.

Organisation: Vital OKR  
NSPPSV205.33

P15: Efficient use of land  
Objection 57.

We object to failure to make clear that this policy will promote smaller scale non-residential development wherever they comply with points 1.1 and 1.2. We suggest adding a point 3 stating that development should be permitted for smaller scale non-residential uses (below the sequential test thresholds) wherever they satisfy 1.1 and 1.2. It should be explained in the Reasons text that there is significant scope for small scale expansion of non-residential development outside of the CAZ, town centres, designated industrial land and allocated sites, and that these can help restore the filligree of premises suitable for such as light industry, studio uses and office use, community uses, niche and local serving retail.

NPPF para 14 requires Local Plans to meet objectively assessed needs.  
NPPF para 154 states that Local Plans should set out clear policies on what will or will not be permitted and where.

NPPF para 6 requires the planning system to contribute to the achievement of sustainable development, including through an economic role, contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements.

Representation noted. This policy does not preclude the ability of smaller scale non-residential development to increase density, provided that points 1.1 and 1.2 are satisfied. The policy also recognises the harmful impact that densities which are too high can have on the environment and quality of life.

London Plan para 6.3.4 states that The Mayor will encourage the delivery of new workspace for SMEs, the creative industries, artists and the fashion industry within new residential and mixed-use developments. He will also provide assistance to artists and creative businesses through the Mayor's Creative Enterprise Zones and promote schemes that provide linked affordable housing and business space in new housing developments.

Organisation: 313-349 Ilderton Road LLP  
NSPPSV217.5

Efficient use of land supports development that maximises the efficient use of land where: the development does not unreasonably compromise development potential or legitimate activities on neighbouring sites; adequate servicing facilities, circulation spaces and access to, from and through the site is provided.  
We support this approach which is consistent with the National Planning Policy Framework

Supportive representation of P15 is acknowledged.

Representation	Officer Response
<p data-bbox="188 616 645 647">P16 Listed buildings and structures</p>	
<p data-bbox="188 659 672 722">Organisation: Bankside Residents Forum NSPPSV19.13</p> <p data-bbox="188 767 1232 863">This policy is not effective because it does not ensure that the relevant specialist advice on the future viable use of the buildings and structures is available before a planning decision is made.</p> <p data-bbox="188 911 1232 1334">Failure to assess damage to listed buildings at the right time and consult relevant stakeholders and subject specialists will result in important heritage loss. We have had a significant recent example of this in 2017. Harker’s Studio in Walworth SE17 – a specially designed building for painting theatre scenery Grade 2 listed - was given permission to be converted to residential, retaining a few of the features. The Council’s decision was taken on the basis of an opinion from an organisation that had no expertise in the viability of the studio in the future. After permission was granted, professional actors and scenery makers and users campaigned against the decision on the grounds that the building was indeed viable and needed in London, as such spaces were increasingly scarce. It then became obvious that the right specialists had not been asked for an opinion. Irreparable harm has now been done not only to the heritage asset but also to a viable structure of importance to the theatre industry.</p>	<p data-bbox="1263 767 2069 935">Representation noted. Point two of this policy ensures that ‘any harm to the significance of the listed building or structure that results from a proposed development must be robustly justified’. It is expected that any justification provided will be informed by specialist advice.</p>

Clearly the consultation process in this case was inadequate. The policy needs to have an addition to avoid this happening again.

To make this policy sound, an additional point could be added to the policy P16 on the following lines:

3. When development is proposed affecting listed buildings and/or structures, a detailed consultation plan, including appropriate specialist assessments and with extended timelines for appraisal, should be presented with planning applications. The specialist interests to be consulted must include users and people and organisations knowledgeable about that industrial sector.

Organisation: Bermondsey Street Area Partnership  
NSPPSV35.2

BSAP is a member organisation of local residents and businesses working together to make our area as good as it can be for people who live here, work here and come to visit.

This policy is not effective because it does not ensure that the relevant specialist advice on the future viable use of the buildings and structures is available before a planning decision is made.

Failure to assess damage to listed buildings at the right time and consult relevant stakeholders and subject specialists will result in important heritage loss. We have had a significant recent example of this in 2017. Harker's Studio in Walworth SE17 – a specially designed building for painting theatre scenery Grade 2 listed - was given permission to be converted to residential, retaining a few of the features. The Council's decision was taken on the basis of an opinion from an organisation that had no expertise in the viability of the studio in the future. After permission was granted, professional actors and scenery makers and users campaigned against the decision on the grounds that the building was indeed viable and needed in London, as such spaces were increasingly scarce. It then became obvious that the right specialists had not been

Representation noted. Point two of this policy ensures that 'any harm to the significance of the listed building or structure that results from a proposed development must be robustly justified'. It is expected that any justification provided will be informed by specialist advice.

asked for an opinion. Irreparable harm has now been done not only to the heritage asset but also to a viable structure of importance to the theatre industry.

Clearly the consultation process in this case was inadequate. The policy needs to have an addition to avoid this happening again.

To make this policy sound, an additional point could be added to the policy P16 on the following lines:

3. When development is proposed affecting listed buildings and/or structures, a detailed consultation plan, including appropriate specialist assessments and with extended timelines for appraisal, should be presented with planning applications. The specialist interests to be consulted must include users and people and organisations knowledgeable about that industrial sector.

Individual  
NSPPSV50.6

This policy is not effective because it does not ensure that the relevant specialist advice on the future viable use of the buildings and structures is available before a planning decision is made. Failure to assess damage to listed buildings at the right time and consult relevant stakeholders and subject specialists will result in important heritage loss. We have had a significant recent example of this in 2017. Harker's Studio in Walworth SE17 – a specially designed building for painting theatre scenery Grade 2 listed - was given permission to be converted to residential, retaining a few of the features. The Council's decision was taken on the basis of an opinion from an organisation that had no expertise in the viability of the studio in the future. After permission was granted, professional actors and scenery makers and users campaigned against the decision on the grounds that the building was indeed viable and needed in London, as such spaces were increasingly scarce. It then became obvious that the right specialists had not been asked for an opinion. Irreparable harm has now been done not only to the heritage asset but also to a viable structure of importance to the theatre industry. Clearly the consultation process in this case was inadequate. The policy needs to have an addition to avoid this happening again.

Representation noted. Point two of this policy ensures that 'any harm to the significance of the listed building or structure that results from a proposed development must be robustly justified'. It is expected that any justification provided will be informed by specialist advice.

Individual  
NSPPSV56.8

This policy is not effective because it does not ensure that the relevant specialist advice on the future viable use of the buildings and structures is available before a planning decision is made.

Failure to assess damage to listed buildings at the right time and consult relevant stakeholders and subject specialists will result in important heritage loss. We have had a significant recent example of this in 2017. Harker's Studio in Walworth SE17 – a specially designed building for painting theatre scenery Grade 2 listed - was given permission to be converted to residential, retaining a few of the features. The Council's decision was taken on the basis of an opinion from an organisation that had no expertise in the viability of the studio in the future. After permission was granted, professional actors and scenery makers and users campaigned against the decision on the grounds that the building was indeed viable and needed in London, as such spaces were increasingly scarce. It then became obvious that the right specialists had not been asked for an opinion. Irreparable harm has now been done not only to the heritage asset but also to a viable structure of importance to the theatre industry.

Clearly the consultation process in this case was inadequate. The policy needs to have an addition to avoid this happening again.

To make this policy sound, an additional point could be added to the policy P16 on the following lines:

3. When development is proposed affecting listed buildings and/or structures, a detailed consultation plan, including appropriate specialist assessments and with extended timelines for appraisal, should be presented with planning applications. The specialist interests to be consulted must include users and people and organisations knowledgeable about that industrial sector.

Representation noted. Point two of this policy ensures that 'any harm to the significance of the listed building or structure that results from a proposed development must be robustly justified'. It is expected that any justification provided will be informed by specialist advice.

This policy is not effective because it does not ensure that the relevant specialist advice on the future viable use of the buildings and structures is available before a planning decision is made.

Failure to assess damage to listed buildings at the right time and consult relevant stakeholders and subject specialists will result in important heritage loss. We have had a significant recent example of this in 2017. Harker's Studio in Walworth SE17 – a specially designed building for painting theatre scenery Grade 2 listed - was given permission to be converted to residential, retaining a few of the features. The Council's decision was taken on the basis of an opinion from an organisation that had no expertise in the viability of the studio in the future. After permission was granted, professional actors and scenery makers and users campaigned against the decision on the grounds that the building was indeed viable and needed in London, as such spaces were increasingly scarce. It then became obvious that the right specialists had not been asked for an opinion. Irreparable harm has now been done not only to the heritage asset but also to a viable structure of importance to the theatre industry.

Clearly the consultation process in this case was inadequate. The policy needs to have an addition to avoid this happening again.

To make this policy sound, an additional point could be added to the policy P16 on the following lines:

3. When development is proposed affecting listed buildings and/or structures, a detailed consultation plan, including appropriate specialist assessments and with extended timelines for appraisal, should be presented with planning applications. The specialist interests to be consulted must include users and people and organisations knowledgeable about that industrial sector.

Representation noted. Point two of this policy ensures that 'any harm to the significance of the listed building or structure that results from a proposed development must be robustly justified'. It is expected that any justification provided will be informed by specialist advice.

NSPPSV83.7

We consider the inclusion of the phrase ‘unjustifiable harm’ in para 1 of policy P16 (Listed Buildings and Structures) in the same way as ‘unacceptable harm’ in P14. We also note that this is in contrast to the text relating to conservation areas in P17. We therefore recommend that this is addressed by amending para 1 to ‘...where it conserves and enhances the special significance ...etc’. Para 2 can then be replaced by ‘Where proposals will have an impact on significance, the tests set out in paragraphs 132-136 in the NPPF will be applied’.

Representation noted. The NSP will be revised taking on comments given to ensure that policies and design guidance is sound, and ensuring compliance with the NPPF & London Plan. In particular, paragraph 1 will be amended for clarity.

Individual  
NSPPSV86.6

This policy is not positively prepared or justified as it does not ensure that the relevant specialist advice on the future viable use of the buildings and structures is available before a planning decision is made. Failure to assess damage to listed buildings at the right time, and consult relevant stakeholders and subject specialists, inevitably results in important heritage loss. This is particularly important as heritage that is important either because of its respective architectural merits, or the important social history that residents associate with it, can never be re-gained.

One recent concerning a specially designed building for painting theatre scenery that is Grade 2 listed; was given permission by the Council to be converted to residential use, retaining few of the features, based on an opinion from an organisation with no expertise in the viability of the building in the future. After permission was granted professional actors, scenery makers and other users campaigned against the decision demonstrating that the building was both viable and much needed in London; and that the right specialists had not been asked for an opinion. Irreparable harm has now been done not only to the heritage asset but also to a viable structure of importance to the theatre industry.

This is just one example of the consultation process used being inadequate and that the Listed Buildings and Structures Policy needs further strengthening.

Representation noted. Point two of this policy ensures that ‘any harm to the significance of the listed building or structure that results from a proposed development must be robustly justified’. It is expected that any justification provided will be informed by specialist advice.

<p>Suggested improvements:</p> <p>An additional point needs to be added to make this policy sound; along the following lines:</p> <p>3. When development is proposed affecting listed buildings and/or structures; a detailed consultation plan, including appropriate specialist assessments, should be presented with planning applications.</p> <p>Extended timescales should be included for the associated appraisal, ensuring that the specialist interests to be consulted include users, and people and organisations who are knowledgeable about that particular sector.</p>	
<p>Individual NSPPSV92.1</p> <p>The NSP is not sound because it has not included the participation of the local community, that is the residents of Canal Grove SE15 (a row of listed cottages) other than a letter dated 7 February from the Council referring residents to the website and with an enclosed site map.</p>	<p>Representation noted. It should be acknowledged that each version of the NSP has been strengthened through input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF &amp; London Plan.</p>
<p>Individual NSPPSV92.3</p> <p>The NSP Annex states that the number of storeys and locations of tall buildings will be monitored and ‘a selection will be reviewed’ to make sure that they ‘avoid unacceptable harm to heritage assets and their settings’ but they have not demonstrated how this will be overseen and what positive action the Council will take to make sure heritage assets are protected.</p> <p>Adjacent sites to Canal Grove are NSP 65, 66 and 68 all of which can consider the inclusion of tall buildings subject to consideration of impacts on existing character, heritage and townscape. There is no evidence of how the cumulative impact of such</p>	<p>The amended Policy P14 states that some of the site allocations have identified possible sites for tall buildings in Peckham and Camberwell taking into account conservation areas and other heritage assets. This policy states that tall buildings must not cause a harmful impact on strategic views, as set of in the London View Management Framework, or to our Borough views. This policy also states that the design of tall buildings will be required to avoid unacceptable harm to the significance of designated heritage assets or their settings. It should be acknowledged that Southwark</p>

<p>developments on Canal Grove will be monitored.</p> <p>To make this policy sound, an additional point should be added at P16:</p> <p>3. When development is proposed affecting listed buildings and/or structures, a detailed consultation plan, including appropriate specialist assessments and with extended timelines for appraisal, should be presented with planning applications. The cumulative impact of adjoining developments (massing, density and height) on listed buildings must be taken into account when individual planning applications are considered.</p>	<p>Council's SCI is currently in the process of being updated and improvements to our ways of communicating with residents shall be a key focal point of this.</p>
<p>Individual NSPPSV95.3</p> <p>This policy is not effective because it does not ensure that the relevant specialist advice on the future viable use of the buildings and structures is available before a planning decision is made.</p> <p>Failure to assess damage to listed buildings at the right time and consult relevant stakeholders and subject specialists will result in important heritage loss. We have had a significant recent example of this in 2017. Harker's Studio in Walworth SE17 – a specially designed building for painting theatre scenery Grade 2 listed - was given permission to be converted to residential, retaining a few of the features. The Council's decision was taken on the basis of an opinion from an organisation that had no expertise in the viability of the studio in the future. After permission was granted, professional actors and scenery makers and users campaigned against the decision on the grounds that the building was indeed viable and needed in London, as such spaces were increasingly scarce. It then became obvious that the right specialists had not been asked for an opinion. Irreparable harm has now been done not only to the heritage asset but also to a viable structure of importance to the theatre industry.</p> <p>Clearly the consultation process in this case was inadequate. The policy needs to have an addition to avoid this happening again.</p>	<p>Representation noted. Point two of this policy ensures that 'any harm to the significance of the listed building or structure that results from a proposed development must be robustly justified'. It is expected that any justification provided will be informed by specialist advice.</p>

To make this policy sound, an additional point could be added to the policy P16 on the following lines:

3. When development is proposed affecting listed buildings and/or structures, a detailed consultation plan, including appropriate specialist assessments and with extended timelines for appraisal, should be presented with planning applications. The specialist interests to be consulted must include users and people and organisations knowledgeable about that industrial sector.

Individual  
NSPPSV96.3

This policy is not effective because it does not ensure that the relevant specialist advice on the future viable use of the buildings and structures is available before a planning decision is made.

Failure to assess damage to listed buildings at the right time and consult relevant stakeholders and subject specialists will result in important heritage loss. We have had a significant recent example of this in 2017. Harker's Studio in Walworth SE17 – a specially designed building for painting theatre scenery Grade 2 listed - was given permission to be converted to residential, retaining a few of the features. The Council's decision was taken on the basis of an opinion from an organisation that had no expertise in the viability of the studio in the future. After permission was granted, professional actors and scenery makers and users campaigned against the decision on the grounds that the building was indeed viable and needed in London, as such spaces were increasingly scarce. It then became obvious that the right specialists had not been asked for an opinion. Irreparable harm has now been done not only to the heritage asset but also to a viable structure of importance to the theatre industry.

Clearly the consultation process in this case was inadequate. The policy needs to have an addition to avoid this happening again.

Representation noted. Point two of this policy ensures that 'any harm to the significance of the listed building or structure that results from a proposed development must be robustly justified'. It is expected that any justification provided will be informed by specialist advice.

To make this policy sound, an additional point could be added to the policy P16 on the following lines:

3. When development is proposed affecting listed buildings and/or structures, a detailed consultation plan, including appropriate specialist assessments and with extended timelines for appraisal, should be presented with planning applications. The specialist interests to be consulted must include users and people and organisations knowledgeable about that industrial sector.

Individual  
NSPPSV99.3

This policy is not effective because it does not ensure that the relevant specialist advice on the future viable use of the buildings and structures is available before a planning decision is made.

Failure to assess damage to listed buildings at the right time and consult relevant stakeholders and subject specialists will result in important heritage loss. We have had a significant recent example of this in 2017. Harker's Studio in Walworth SE17 – a specially designed building for painting theatre scenery Grade 2 listed - was given permission to be converted to residential, retaining a few of the features. The Council's decision was taken on the basis of an opinion from an organisation that had no expertise in the viability of the studio in the future. After permission was granted, professional actors and scenery makers and users campaigned against the decision on the grounds that the building was indeed viable and needed in London, as such spaces were increasingly scarce. It then became obvious that the right specialists had not been asked for an opinion. Irreparable harm has now been done not only to the heritage asset but also to a viable structure of importance to the theatre industry.

Clearly the consultation process in this case was inadequate. The policy needs to have an addition to avoid this happening again.

Representation noted. Point two of this policy ensures that 'any harm to the significance of the listed building or structure that results from a proposed development must be robustly justified'. It is expected that any justification provided will be informed by specialist advice.

To make this policy sound, an additional point could be added to the policy P16 on the following lines:

3. When development is proposed affecting listed buildings and/or structures, a detailed consultation plan, including appropriate specialist assessments and with extended timelines for appraisal, should be presented with planning applications. The specialist interests to be consulted must include users and people and organisations knowledgeable about that industrial sector.

Individual  
NSPPSV110.7

Policy P16 (Listed buildings and structures) is unsound because it is not effective. The policy notes that 'historic assets are irreplaceable' and are essential community assets. This is an important principle, but is ignored in the Area Visions later in the document. It is therefore not an effective policy.

Representation has been acknowledged. All area visions will be amended to strengthen the design guidance to ensure compliance with the NPPF & London Plan. Amendments will show a reflection of development sites in conservation areas, with listed buildings and heritage assets, in addition to buildings of important significance. All background papers will be made public alongside the final submission of the NSP and will include a local list as part of the Heritage SPD.

Individual  
NSPPSV116.3

This policy is not effective because it does not ensure that the relevant specialist advice on the future viable use of the buildings and structures is available before a planning decision is made.

Failure to assess damage to listed buildings at the right time and consult relevant stakeholders and subject specialists will result in important heritage loss. We have had a significant recent example of this in 2017. Harker's Studio in Walworth SE17 – a specially designed building for painting theatre scenery Grade 2 listed - was given permission to be converted to residential, retaining a few of the features. The Council's

Representation noted. Point two of this policy ensures that 'any harm to the significance of the listed building or structure that results from a proposed development must be robustly justified'. It is expected that any justification provided will be informed by specialist advice.

decision was taken on the basis of an opinion from an organisation that had no expertise in the viability of the studio in the future. After permission was granted, professional actors and scenery makers and users campaigned against the decision on the grounds that the building was indeed viable and needed in London, as such spaces were increasingly scarce. It then became obvious that the right specialists had not been asked for an opinion. Irreparable harm has now been done not only to the heritage asset but also to a viable structure of importance to the theatre industry.

Clearly the consultation process in this case was inadequate. The policy needs to have an addition to avoid this happening again.

To make this policy sound, an additional point could be added to the policy P16 on the following lines:

3. When development is proposed affecting listed buildings and/or structures, a detailed consultation plan, including appropriate specialist assessments and with extended timelines for appraisal, should be presented with planning applications. The specialist interests to be consulted must include users and people and organisations knowledgeable about that industrial sector.

Organisation: Dulwich Society  
NSPPSV119.3

I write as a member of the Dulwich Society. My comments relate to the Development Management Policies covering aspects of the historic environment.

At the outset, I am bound to suggest that the Plan is basically unsound because it fails to take on the emerging policies and proposals contained in the Draft London Plan. This is a matter of timing, and in no sense represents an error of judgement on the part of Southwark. Ideally therefore, we suggest that the Plan be withdrawn pending the outcome of the EIP into the London Plan. Failure to do so, will mean that the Plan will subsequently require substantial amendment, because the approach adopted in the new London Plan differs markedly from that of its predecessor.

Representation noted. The NSP will be revised taking on comments given to ensure that policies and design guidance is sound, and ensuring compliance with the NPPF & London Plan. In particular, paragraph 1 will be amended for clarity. The NSP is being prepared with regard to policies and proposals contained in the Draft London Plan.

The Society's comments on the Development Management policies are as follows:

P16 Listed buildings and structures.

This is another case of a policy employing confusing double negatives: 'Development relating to listed buildings and structures will only be permitted where it avoids unjustifiable harm to the special significance of listed buildings and settings by conserving and enhancing'... Noting the continuing relevance of the Planning (Listed Buildings and Conservation Areas) Act 1990, we suggest that in considering development proposals affecting a listed building or its setting 'special regard be had to the desirability of preserving the building or its setting or any features of special architectural or historic interest that it possesses'....

Individual  
NSPPSV126.3

This policy is not effective because it does not ensure that the relevant specialist advice on the future viable use of the buildings and structures is available before a planning decision is made.

Failure to assess damage to listed buildings at the right time and consult relevant stakeholders and subject specialists will result in important heritage loss. We have had a significant recent example of this in 2017. Harker's Studio in Walworth SE17 – a specially designed building for painting theatre scenery Grade 2 listed - was given permission to be converted to residential, retaining a few of the features. The Council's decision was taken on the basis of an opinion from an organisation that had no expertise in the viability of the studio in the future. After permission was granted, professional actors and scenery makers and users campaigned against the decision on the grounds that the building was indeed viable and needed in London, as such spaces were increasingly scarce. It then became obvious that the right specialists had not been asked for an opinion. Irreparable harm has now been done not only to the heritage asset but also to a viable structure of importance to the theatre industry.

Representation noted. Point two of this policy ensures that 'any harm to the significance of the listed building or structure that results from a proposed development must be robustly justified'. It is expected that any justification provided will be informed by specialist advice.

Clearly the consultation process in this case was inadequate. The policy needs to have an addition to avoid this happening again.

To make this policy sound, an additional point could be added to the policy P16 on the following lines:

3. When development is proposed affecting listed buildings and/or structures, a detailed consultation plan, including appropriate specialist assessments and with extended timelines for appraisal, should be presented with planning applications. The specialist interests to be consulted must include users and people and organisations knowledgeable about that industrial sector.

Individual  
NSPPSV130.3

This policy is not effective because it does not ensure that the relevant specialist advice on the future viable use of the buildings and structures is available before a planning decision is made.

Failure to assess damage to listed buildings at the right time and consult relevant stakeholders and subject specialists will result in important heritage loss. We have had a significant recent example of this in 2017. Harker's Studio in Walworth SE17 – a specially designed building for painting theatre scenery Grade 2 listed - was given permission to be converted to residential, retaining a few of the features. The Council's decision was taken on the basis of an opinion from an organisation that had no expertise in the viability of the studio in the future. After permission was granted, professional actors and scenery makers and users campaigned against the decision on the grounds that the building was indeed viable and needed in London, as such spaces were increasingly scarce. It then became obvious that the right specialists had not been asked for an opinion. Irreparable harm has now been done not only to the heritage asset but also to a viable structure of importance to the theatre industry.

Representation noted. Point two of this policy ensures that 'any harm to the significance of the listed building or structure that results from a proposed development must be robustly justified'. It is expected that any justification provided will be informed by specialist advice.

Clearly the consultation process in this case was inadequate. The policy needs to have an addition to avoid this happening again.

To make this policy sound, an additional point could be added to the policy P16 on the following lines:

3. When development is proposed affecting listed buildings and/or structures, a detailed consultation plan, including appropriate specialist assessments and with extended timelines for appraisal, should be presented with planning applications. The specialist interests to be consulted must include users and people and organisations knowledgeable about that industrial sector.

Individual  
NSPPSV132.3

This policy is not effective because it does not ensure that the relevant specialist advice on the future viable use of the buildings and structures is available before a planning decision is made.

When development is proposed affecting listed buildings and/or structures, a detailed consultation plan, including appropriate specialist assessments and with extended timelines for appraisal, should be presented with planning applications.

#### DETAIL / PROPOSED CHANGES

The specialist interests to be consulted must include users and people and

Representation noted. Point two of this policy ensures that 'any harm to the significance of the listed building or structure that results from a proposed development must be robustly justified'. It is expected that any justification provided will be informed by specialist advice.

organisations knowledgeable about the appropriate industrial sector.

Individual  
NSPPSV134.1

Failure to assess damage to listed buildings at the right time and consult relevant stakeholders and subject specialists will result in important heritage loss. When development or retrofitting is carried on listed buildings and/or structures, or buildings and structures house specialist infrastructure: consultation processes and specialist assessments should be presented with planning applications and adequate timelines should be designated for appraisal.

Harker's Studio in Walworth SE17 is an example of heritage loss due to the lack of specialist consultation. To make this policy sound, an additional policy should be introduced protecting unlisted buildings or structures that have been recognised as heritage assets or that hold specialist infrastructure.

For example, the extended or additional policy could say that:

Development, retrofitting or damage to listed buildings and structures, and unlisted buildings that house specialist infrastructure or special interest uses, require:

- i i. Specialist assessments,
- ii ii. Consultation processes; and
- iii iii. Adequate appraisal timelines

Representation noted. Point two of this policy ensures that 'any harm to the significance of the listed building or structure that results from a proposed development must be robustly justified'. It is expected that any justification provided will be informed by specialist advice.

Organisation: Peckham Heritage Regeneration Partnership.  
NSPPSV139.1

P16 is not effective because it does not ensure that the contribution of a listed building to its setting or its place within a group is clearly assessed, in order to evaluate whether these are 'protected or enhanced'.

Policy P16 states that, 'with regard to development relating to listed buildings and structures, the following are 'protected or enhanced':

- (ii) the contribution of the building to its setting or its place within a group
- (ii) views that contribute positively to the significance of the building or structure or their setting'

An example of the ineffectiveness of this Policy is the pair of new developments permitted at the north and south corners of Highshore Road/Rye Lane. These developments interrupt the 'place within the group', the views, the historic spatial relationship and setting of the adjacent group of early – mid C19th listed buildings (Rye Lane Baptist Chapel, Post Office depot (former friends Meeting House) and early C19th houses on Highshore Road).

Historic England guidance defines significance as:

"The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting."

To make this policy sound, an additional point could be added to the policy P16 as follows:

When new development is proposed, the setting and grouping of listed buildings 'relating to the development' should be clearly analysed. Written and visual analysis of the impact of the proposed development on the setting and multiple views of the listed buildings/group should be presented in evidence. The extent to which the setting, grouping, and views of the listed buildings / groups 'relating' to new development are 'protected or enhanced' should be appraised.

Representation noted. Point two of this policy ensures that 'any harm to the significance of the listed building or structure that results from a proposed development must be robustly justified'. Point 1, clarifies what development must conserve and enhance. As such, it is not necessary to add an additional point to this policy.

. 1 Development relating to listed buildings and structures will only be permitted where it avoids unjustifiable harm to the special significance of listed buildings and structures and their settings by conserving and enhancing:

PS suggest omit 'unjustifiable' because if it harms it cannot enhance. Any new development must enhance the Listed Building

Representation noted. The NSP will be revised taking on comments given to ensure that policies and design guidance is sound, and ensuring compliance with the NPPF & London Plan. In particular, paragraph 1 will be amended for clarity.

Individual  
NSPPSV150.5

This policy is not effective because it does not ensure that the relevant specialist advice on the future viable use of the buildings and structures is available before a planning decision is made.

Failure to assess damage to listed buildings at the right time and consult relevant stakeholders and subject specialists will result in important heritage loss. We have had a significant recent example of this in 2017. Harker's Studio in Walworth SE17 – a specially designed building for painting theatre scenery Grade 2 listed - was given permission to be converted to residential, retaining a few of the features. The Council's decision was taken on the basis of an opinion from an organisation that had no expertise in the viability of the studio in the future. After permission was granted, professional actors and scenery makers and users campaigned against the decision on the grounds that the building was indeed viable and needed in London, as such spaces were increasingly scarce. It then became obvious that the right specialists had not been asked for an opinion. Irreparable harm has now been done not only to the heritage asset but also to a viable structure of importance to the theatre industry.

Clearly the consultation process in this case was inadequate. The policy needs to have an addition to avoid this happening again.

Representation noted. Point two of this policy ensures that 'any harm to the significance of the listed building or structure that results from a proposed development must be robustly justified'. It is expected that any justification provided will be informed by specialist advice.

<p>To make this policy sound, an additional point could be added to the policy P16 on the following lines:</p> <p>3. When development is proposed affecting listed buildings and/or structures, a detailed consultation plan, including appropriate specialist assessments and with extended timelines for appraisal, should be presented with planning applications. The specialist interests to be consulted must include users and people and organisations knowledgeable about that industrial sector.</p>	
<p>Individual NSPPSV151.11</p> <p>P16</p> <p>The policy should be amended to reflect the advice in the NPPF (particularly section 12 NPPF).</p> <p>Amend as per the advice in the NPPF.</p>	<p>Representation has been acknowledged and feedback from this round of consultation will help with revisions to the NSP to ensure that guidance is sound and complies with the NPPF &amp; London Plan.</p>
<p>Organisation: Shad Thames Area Management Partnership NSPPSV161.2</p> <p>P16, Page 44 Listed buildings and structures</p> <p>Not Effective</p> <p>This policy is not effective because it does not ensure that the relevant specialist advice on the future viable use of the buildings and structures is available before a planning decision is made.</p>	<p>Representation noted. Point two of this policy ensures that ‘any harm to the significance of the listed building or structure that results from a proposed development must be robustly justified’. It is expected that any justification provided will be informed by specialist advice.</p>

Failure to assess damage to listed buildings at the right time and consult relevant stakeholders and subject specialists will result in important heritage loss. We have had a significant recent example of this in 2017. Harker's Studio in Walworth SE17 – a specially designed building for painting theatre scenery Grade 2 listed - was given permission to be converted to residential, retaining a few of the features. The Council's decision was taken on the basis of an opinion from an organisation that had no expertise in the viability of the studio in the future. After permission was granted, professional actors and scenery makers and users campaigned against the decision on the grounds that the building was indeed viable and needed in London, as such spaces were increasingly scarce. It then became obvious that the right specialists had not been asked for an opinion. Irreparable harm has now been done not only to the heritage asset but also to a viable structure of importance to the theatre industry.

Clearly the consultation process in this case was inadequate. The policy needs to have an addition to avoid this happening again.

To make this policy sound, an additional point could be added to the policy P16 on the following lines:

3. When development is proposed affecting listed buildings and/or structures, a detailed consultation plan, including appropriate specialist assessments and with extended timelines for appraisal, should be presented with planning applications. The specialist interests to be consulted must include users and people and organisations knowledgeable about that industrial sector.

Individual  
NSPPSV193.3

With regards to the decision not to have a borough wide local list:  
- Due to obvious gaps and inconsistencies - see below

Representation has been acknowledged. All NSP policies will be amended to strengthen the design guidance to ensure compliance

- The policy is not effective because it is inconsistent with national policy in the NPPF which includes heritage assets included on the Local List. It fails to explain how without a Local List, unlisted buildings and heritage assets will be protected and enhanced by new development, and so not able to achieve its aim.
- No clear audit trail of how the preferred approach was arrived at while the consultation that has taken place has not allowed for effective engagement - see below

The policy recognises the existence of conservation and heritage assets that are not protected under the Planning (Listed Buildings and Conservation Areas) Act 1990 but does not provide for a Local List which is the nationally recognised method for giving them protection. Many other councils have borough wide Local Lists ( Camden, Croydon, Tower Hamlets, Lambeth and Hackney...) informed by Historic England guidance:

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

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

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

<https://historicengland.org.uk/listing/what-is-designation/local/local-designations>

This issue was raised with the council by the Forum in September 2017 and many times

with the NPPF & London Plan. Amendments will show a reflection of development sites in conservation areas, with listed buildings and heritage assets, in addition to buildings of important significance. All evidence base background papers will be made public alongside the final submission of the NSP and will include a local list as part of the Heritage SPD.

since including in a Public Question at Council Assembly on Nov 29th and a follow up meeting in January at the planning department where clarifications were promised but not subsequently honoured to make clear the council's position and the process that had been undertaken. It was at least admitted that there are gaps in policy in areas not covered by the combination of AAPs, SPDs, Conservation Areas and Neighbourhood Plans however the question as to what disadvantages there are to having a borough wide local list has been continually avoided. Despite an FOIA request on the subject no audit trail has been made available to explain why members decided to remove policy DM55 "Local List buildings and views" from the Options version from October 2014.

Despite the Peckham and Nunhead AAP 2014 and the adopted version of the Elephant & Castle SPD from March 2012 for example making specific reference to local lists the local list policy has been dropped from the NSP and those officers from whom the audit trail has been requested (the Planning Policy Manager, the Head of Planning and the Cabinet Member for Regeneration and Homes) have variously admitted to not being familiar with key guidance on the subject like "Historic England Advice Note 7" for example which sets out how according to appropriate selection methods and criteria, locally identified assets in the context of Conservation Areas can benefit from an elevated protection - namely the general control over demolition afforded by the Planning (Listed Buildings and Conservation) Act 1990. It would appear that the council have not therefore considered either the disadvantages nor the (full) advantages to having a borough wide local list.

#### Detail/ Proposed Changes.

The NSP should clearly identify specific sites in the borough where tall buildings are appropriate giving indicative heights and work.

This strategy should be worked on with the mayor and crucially these locations and indicative heights should be put out for appropriate consultation with local residents and businesses. This could form the core of an evidence base to update the study of 2010.

It should be made clear that tall buildings will otherwise/elsewhere be deemed inappropriate and a definition given for what would constitute a “tall building” - as per the London Plan requirement in D8 Part A

Individual  
NSPPSV219.1

This policy is not justified because it has not taken into account the response from consultations.

Harker’s Studio in Walworth SE17 – a specially designed building for painting theatre scenery Grade 2 listed - was given permission to be converted to residential, retaining a few of the features. Clearly the consultation process in this case was inadequate. The policy needs to have an addition to avoid this happening again.

This policy is not effective because it does not ensure that the relevant specialist advice on the future viable use of the buildings and structures is available before a planning decision is made.

Failure to assess damage to listed buildings at the right time and consult relevant stakeholders and subject specialists will result in important heritage loss. We have had a significant recent example of this Southwark. EG the East Lodge at Nunhead Cemetery and the boundary wall of the cemetery. It is evident that the right specialists had not been asked for an opinion. Harm has now been done to this heritage asset.

To make this policy sound, an additional point could be added to the policy P16 on the following lines:

Potential options to listed buildings will have a clear and comprehensive consultation, which will include appropriate specialist assessments and with extended timelines for appraisal. This

Representation noted. Point two of this policy ensures that ‘any harm to the significance of the listed building or structure that results from a proposed development must be robustly justified’. It is expected that any justification provided will be informed by specialist advice.

work will be submitted along with planning applications. The specialist interests to be consulted must include users and people and organisations knowledgeable about that industrial sector.

Individual  
NSPPSV221.1

This policy is not effective because it does not ensure that the relevant specialist advice on the future viable use of the buildings and structures is available before a planning decision is made.

Failure to assess damage to listed buildings at the right time and consult relevant stakeholders and subject specialists will result in important heritage loss. We have had a significant recent example of this in 2017. Harker's Studio in Walworth SE17 – a specially designed building for painting theatre scenery Grade 2 listed - was given permission to be converted to residential, retaining a few of the features. The Council's decision was taken on the basis of an opinion from an organisation that had no expertise in the viability of the studio in the future. After permission was granted, professional actors and scenery makers and users campaigned against the decision on the grounds that the building was indeed viable and needed in London, as such spaces were increasingly scarce. It then became obvious that the right specialists had not been asked for an opinion. Irreparable harm has now been done not only to the heritage asset but also to a viable structure of importance to the theatre industry.

Clearly the consultation process in this case was inadequate. The policy needs to have an addition to avoid this happening again.

To make this policy sound, an additional point could be added to the policy P16 on the following lines:

3. When development is proposed affecting listed buildings and/or structures, a detailed consultation plan, including appropriate specialist assessments and with extended timelines for appraisal, should be presented with planning applications. The

Representation noted. Point two of this policy ensures that 'any harm to the significance of the listed building or structure that results from a proposed development must be robustly justified'. It is expected that any justification provided will be informed by specialist advice.

specialist interests to be consulted must include users and people and organisations knowledgeable about that industrial sector.

Individual  
NSPPSV228.2

This policy is not effective because it does not ensure that the relevant specialist advice on the future viable use of the buildings and structures is available before a planning decision is made.

Failure to assess damage to listed buildings at the right time and consult relevant stakeholders and subject specialists will result in important heritage loss. We have had a significant recent example of this in 2017. Harker's Studio in Walworth SE17 – a specially designed building for painting theatre scenery Grade 2 listed - was given permission to be converted to residential, retaining a few of the features. The Council's decision was taken on the basis of an opinion from an organisation that had no expertise in the viability of the studio in the future. After permission was granted, professional actors and scenery makers and users campaigned against the decision on the grounds that the building was indeed viable and needed in London, as such spaces were increasingly scarce. It then became obvious that the right specialists had not been asked for an opinion. Irreparable harm has now been done not only to the heritage asset but also to a viable structure of importance to the theatre industry.

Clearly the consultation process in this case was inadequate. The policy needs to have an addition to avoid this happening again.

To make this policy sound, an additional point could be added to the policy P16 on the following lines:

3. When development is proposed affecting listed buildings and/or structures, a detailed consultation plan, including appropriate specialist assessments and with extended timelines for appraisal, should be presented with planning applications. The specialist interests to be consulted must include users and people and organisations

Representation noted. Point two of this policy ensures that 'any harm to the significance of the listed building or structure that results from a proposed development must be robustly justified'. It is expected that any justification provided will be informed by specialist advice.

knowledgeable about that industrial sector.

Individual  
NSPPSV316.8

Do you consider that the New Southwark Plan is unsound because it is not: Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.

This policy is not effective because it does not ensure that the relevant specialist advice on the future viable use of the buildings and structures is available before a planning decision is made.

Failure to assess damage to listed buildings at the right time and consult relevant stakeholders and subject specialists will result in important heritage loss. We have had a significant recent example of this in 2017. Harker's Studio in Walworth SE17 – a specially designed building for painting theatre scenery Grade 2 listed - was given permission to be converted to residential, retaining a few of the features. The Council's decision was taken on the basis of an opinion from an organisation that had no expertise in the viability of the studio in the future. After permission was granted, professional actors and scenery makers and users campaigned against the decision on the grounds that the building was indeed viable and needed in London, as such spaces were increasingly scarce. It then became obvious that the right specialists had not been asked for an opinion. Irreparable harm has now been done not only to the heritage asset but also to a viable structure of importance to the theatre industry.

Clearly the consultation process in this case was inadequate. The policy needs to have an addition to avoid this happening again.

To make this policy sound, an additional point could be added to the policy P16 on the following lines:

*3. When development is proposed affecting listed buildings and/or structures, a detailed consultation plan, including appropriate specialist assessments and with extended timelines for appraisal, should be presented with planning applications. The specialist*

Representation noted. Point two of this policy ensures that 'any harm to the significance of the listed building or structure that results from a proposed development must be robustly justified'. It is expected that any justification provided will be informed by specialist advice.

*interests to be consulted must include users and people and organisations knowledgeable about that industrial sector.*

Individual  
NSPPSV324.5

Policy 16 is not effective because it does not ensure that the relevant specialist advice on the future viable use of the buildings and structures is available before a planning decision is made. Failure to assess damage to listed buildings at the right time and consult relevant stakeholders and subject specialists will result in important heritage loss. A recent example of this is Harker's Studio in Walworth SE17: a specially designed building for painting theatre scenery Grade 2 listed was given permission to be converted to residential, retaining a few of the features. The Council's decision was taken on the basis of an opinion from an organisation that had no expertise in the viability of the studio in the future. After permission was granted, professional actors and scenery makers and users campaigned against the decision on the grounds that the building was indeed viable and needed in London, as such spaces were increasingly scarce. It then became obvious that the right specialists had not been asked for an opinion. Irreparable harm has now been done not only to the heritage asset but also to a viable structure of importance to the theatre industry. Clearly the consultation process was inadequate.

An additional point should be added to the policy to prevent cases such as the above.

Proposed change:

To make the policy sound an additional point could be added such as:

3. When development is proposed affecting listed buildings and/or structures, a detailed consultation plan, including appropriate specialist assessments and with extended timelines for appraisal, should be presented with planning applications. The specialist interests to be consulted must include users and people and organisations knowledgeable about that industrial sector.

Representation noted. Point two of this policy ensures that 'any harm to the significance of the listed building or structure that results from a proposed development must be robustly justified'. It is expected that any justification provided will be informed by specialist advice.

Representation	Officer Response
<p><a href="#">P17: Conservation areas</a></p>	
<p>Organisation: <a href="#">Bankside Residents Forum</a>  <a href="#">NSPPSV19.14</a></p> <p>The policy is not effective because of conflicting NSP policy that seeks high density residential developments.</p> <p>Currently Conservation Area Appraisals are being ignored when planning applications come up in Conservation Areas, because the pressure to build residential accommodation, even when unaffordable, seems to override. There is nothing new in this policy that would change this status quo. The result of this conflict is that permission is being given for buildings that are out of scale in height and mass with the Conservation Area, eroding its settings, views and compromising historic character and distinctiveness.</p> <p>Some solution needs to be found to this if this policy P17 is to be made effective and sound. One way for example might be to add something on the following lines.</p> <p>3.2 When any developments are proposed that breach the prevailing heights, mass and density in a Conservation Area, this should be subject to additional public consultation before any such developments can be determined.</p>	<p>Representation noted. The Amended Policy P14: Tall buildings does not inherently conflict with this policy. The amended Policy P14 states that some of the site allocations have identified possible sites for tall buildings in Peckham and Camberwell taking into account conservation areas and other heritage assets. This policy states that tall buildings must not cause a harmful impact on strategic views, as set of in the London View Management Framework, or to our Borough views. This policy also states that the design of tall buildings will be required to avoid unacceptable harm to the significance of designated heritage assets or their settings.</p>

<p>Organisation: Berkeley Homes (South East London) NSPPSV21.6</p> <p>It would be helpful for Policy P17 and P18 to be considered alongside Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) to bring consistency in approach.</p>	<p>Representation noted. The NSP will be revised taking on comments given to ensure that policies and design guidance is sound, and ensuring compliance with the NPPF &amp; London Plan. It is viewed that the policy is in conformity with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended).</p>
<p>Organisation: Bermondsey Street Area Partnership NSPPSV35.3</p> <p>The policy is not effective because of conflicting NSP policy that seeks high density residential developments.</p> <p>Currently Conservation Area Appraisals are being ignored when planning applications come up in Conservation Areas, because the pressure to build residential accommodation, even when unaffordable, seems to override. There is nothing new in this policy that would change this status quo. The result of this conflict is that permission is being given for buildings that are out of scale in height and mass with the Conservation Area, eroding its settings, views and compromising historic character and distinctiveness.</p> <p>Some solution needs to be found to this if this policy P17 is to be made effective and sound. One way for example might be to add something on the following lines.</p> <p>3.2 When any developments are proposed that breach the prevailing heights, mass and density in a Conservation Area, this should be subject to additional public consultation before any such developments can be determined.</p>	<p>Representation noted. The Amended Policy P14: Tall buildings does not inherently conflict with this policy. The amended Policy P14 states that some of the site allocations have identified possible sites for tall buildings in Peckham and Camberwell taking into account conservation areas and other heritage assets. This policy states that tall buildings must not cause a harmful impact on strategic views, as set of in the London View Management Framework, or to our Borough views. This policy states that tall buildings must not cause a harmful impact on strategic views as set of in the London View Management Framework, or to our Borough views. This matter is explored in more detail in policy P23: World Heritage Sites. This policy states that the design of tall buildings will be required to contribute to the conservation and enhancement of the significance of designated heritage assets and their settings.</p>
<p>Individual NSPPSV56.9</p>	

The policy is not effective because of conflicting NSP policy that seeks high density residential developments.

Currently Conservation Area Appraisals are being ignored when planning applications come up in Conservation Areas, because the pressure to build residential accommodation, even when unaffordable, seems to override. There is nothing new in this policy that would change this status quo. The result of this conflict is that permission is being given for buildings that are out of scale in height and mass with the Conservation Area, eroding its settings, views and compromising historic character and distinctiveness.

Some solution needs to be found to this if this policy P17 is to be made effective and sound. One way for example might be to add something on the following lines.

3.2 When any developments are proposed that breach the prevailing heights, mass and density in a Conservation Area, this should be subject to additional public consultation before any such developments can be determined.

Individual  
NSPPSV79.2

The policy is not effective because of conflicting NSP policy that seeks high density residential developments.

Currently Conservation Area Appraisals are being ignored when planning applications come up in Conservation Areas, because the pressure to build residential accommodation, even when unaffordable, seems to override. There is nothing new in this policy that would change this status quo. The result of this conflict is that permission is being given for buildings that are out of scale in height and mass with the Conservation Area, eroding its settings, views and compromising historic character and distinctiveness.

Representation noted. The Amended Policy P14: Tall buildings does not inherently conflict with this policy. The amended Policy P14 states that some of the site allocations have identified possible sites for tall buildings in Peckham and Camberwell taking into account conservation areas and other heritage assets. This policy states that tall buildings must not cause a harmful impact on strategic views, as set of in the London View Management Framework, or to our Borough views. This policy also states that the design of tall buildings will be required to contribute to the conservation and enhancement of the significance of designated heritage assets and their settings.

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Some solution needs to be found to this if this policy P17 is to be made effective and sound. One way for example might be to add something on the following lines.

3.2 When any developments are proposed that breach the prevailing heights, mass and density in a Conservation Area, this should be subject to additional public consultation before any such developments can be determined.

designated heritage assets and their settings.

Individual  
NSPPSV86.7

The policy is neither positively prepared nor justified because of conflicting NSP policy that seeks high density residential developments that appears to take precedence.

Currently Conservation Area Appraisals are regularly ignored when planning applications come up that impact on conservation area; either favourably or unfavourably. Presumably because there is pressure to build residential accommodation; Conservation Area designation is given no importance. To add insult to injury, this is not even to provide for affordable housing which is in such high demand in the borough, being typically for “unaffordable” housing instead. seems to override. Consequently, the effectiveness of this Policy is called into serious question.

There is nothing new in this policy that would change this situation; and in the meantime, permission is being given for buildings that are out of scale in height and mass with the Conservation Area, eroding its settings, views and compromising historic character and distinctiveness that can never be replaced.

Suggested improvements:

To make Policy P17 effective and sound the following might be added:

3.2 When any developments are proposed that do not accord with the existing heights, mass and density in a Conservation Area, this should be subject to additional public

Representation noted. The Amended Policy P14: Tall buildings does not inherently conflict with this policy. The amended Policy P14 states that some of the site allocations have identified possible sites for tall buildings in Peckham and Camberwell taking into account conservation areas and other heritage assets. This policy states that tall buildings must not cause a harmful impact on strategic views as set of in the London View Management Framework, or to our Borough views. This matter is explored in more detail in policy P23: World Heritage Sites. This policy states that the design of tall buildings will be required to contribute to the conservation and enhancement of the significance of designated heritage assets and their settings.

<p>consultation before any such developments can be determined; and decision ultimately taken by the full Planning Committee and not under delegated powers.</p>	
<p>Individual NSPPSV95.4</p> <p>The policy is not effective because of conflicting NSP policy that seeks high density residential developments.</p> <p>Currently Conservation Area Appraisals are being ignored when planning applications come up in Conservation Areas, because the pressure to build residential accommodation, even when unaffordable, seems to override. There is nothing new in this policy that would change this status quo. The result of this conflict is that permission is being given for buildings that are out of scale in height and mass with the Conservation Area, eroding its settings, views and compromising historic character and distinctiveness.</p> <p>Some solution needs to be found to this if this policy P17 is to be made effective and sound. One way for example might be to add something on the following lines.</p> <p>3.2 When any developments are proposed that breach the prevailing heights, mass and density in a Conservation Area, this should be subject to additional public consultation before any such developments can be determined.</p>	<p>Representation noted. The Amended Policy P14: Tall buildings does not inherently conflict with this policy. The amended Policy P14 states that some of the site allocations have identified possible sites for tall buildings in Peckham and Camberwell taking into account conservation areas and other heritage assets. This policy states that tall buildings must not cause a harmful impact on strategic views as set of in the London View Management Framework, or to our Borough views. This matter is explored in more detail in policy P23: World Heritage Sites. This policy states that the design of tall buildings will be required to contribute to the conservation and enhancement of the significance of designated heritage assets and their settings.</p>
<p>Individual NSPPSV96.4</p> <p>The policy is not effective because of conflicting NSP policy that seeks high density residential developments.</p> <p>Currently Conservation Area Appraisals are being ignored when planning applications come up in Conservation Areas, because the pressure to build residential</p>	<p>The Amended Policy P14: Tall buildings does not inherently conflict with this policy. The amended Policy P14 states that some of the site allocations have identified possible sites for tall buildings in Peckham and Camberwell taking into account conservation areas and other heritage assets. This policy states that tall buildings must not cause a harmful impact on strategic views as set of in the</p>

accommodation, even when unaffordable, seems to override. There is nothing new in this policy that would change this status quo. The result of this conflict is that permission is being given for buildings that are out of scale in height and mass with the Conservation Area, eroding its settings, views and compromising historic character and distinctiveness.

Some solution needs to be found to this if this policy P17 is to be made effective and sound. One way for example might be to add something on the following lines.

3.2 When any developments are proposed that breach the prevailing heights, mass and density in a Conservation Area, this should be subject to additional public consultation before any such developments can be determined.

London View Management Framework, or to our Borough views. This matter is explored in more detail in policy P23: World Heritage Sites. This policy states that the design of tall buildings will be required to contribute to the conservation and enhancement of the significance of designated heritage assets and their settings.

Individual  
NSPPSV97.2

Policy P17: Conservation Areas (pgs 44-45) is unsound because:

- it is not effective.

This policy is often compromised by the need for housing in the borough and should be strengthened if it is to have any meaning at all. The need for housing is real and important, and the individual circumstances of each site need to be assessed. Where a proposed development conflicts with the existing character of a conservation area (for example by being different to the prevailing height or massing) then it would be appropriate for a greater level of scrutiny and public consultation to be required.

Changes that would make the policy sound include:

- The addition of a clause to state when greater public consultation (and possibly guidance from the relevant experts such as Historic England or local conservation and architectural professionals) is merited.

Southwark's policies in the NSP and anticipated growth targets are supported by our AMR, LDD data, site methodology paper and our Growth model paper. These documents help set our projections of estimated housing to be delivered in the Borough and capacity for retail/employment. The Amended Policy P14: Tall buildings does not inherently conflict with this policy. The amended Policy P14 states that some of the site allocations have identified possible sites for tall buildings in Peckham and Camberwell taking into account conservation areas and other heritage assets. This policy states that tall buildings must not cause a harmful impact on strategic views as set of in the London View Management Framework, or to our Borough views. This matter is explored in more detail in policy P23: World Heritage Sites. This policy states that the design of tall buildings will be required to contribute to the conservation and enhancement of the significance of designated heritage assets and their settings.

Individual  
NSPPSV99.4

The policy is not effective because of conflicting NSP policy that seeks high density residential developments.

Currently Conservation Area Appraisals are being ignored when planning applications come up in Conservation Areas, because the pressure to build residential accommodation, even when unaffordable, seems to override. There is nothing new in this policy that would change this status quo. The result of this conflict is that permission is being given for buildings that are out of scale in height and mass with the Conservation Area, eroding its settings, views and compromising historic character and distinctiveness.

Some solution needs to be found to this if this policy P17 is to be made effective and sound. One way for example might be to add something on the following lines.

3.2 When any developments are proposed that breach the prevailing heights, mass and density in a Conservation Area, this should be subject to additional public consultation before any such developments can be determined.

Individual  
NSPPSV110.8

Policy P17 (Conservation areas) is unsound because it is not effective. The policy notes that developments must conserve and enhance the significance of conservation areas, taking into account their local character and appearance. But in Peckham, planning applications have been approved that do not conserve or enhance the significance of the area, and the plans stated under the Peckham Area Vision, which detail development within a conservation areas, make no reference to, or recognition of, this section of the Plan. The policy is therefore not effective.

The Amended Policy P14: Tall buildings does not inherently conflict with this policy. The amended Policy P14 states that some of the site allocations have identified possible sites for tall buildings in Peckham and Camberwell taking into account conservation areas and other heritage assets. This policy states that tall buildings must not cause a harmful impact on strategic views as set of in the London View Management Framework, or to our Borough views. This matter is explored in more detail in policy P23: World Heritage Sites. This policy states that the design of tall buildings will be required to contribute to the conservation and enhancement of the significance of designated heritage assets and their settings.

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<p>Organisation: London Community Land Trust NSPPSV111.2</p> <p>Related policy P17: Conservation areas (pg 44-45) could be strengthened by changing the wording to include the need for more extensive advertising of and public consultation on proposals that are brought forward that are higher than the prevailing existing townscape.</p>	<p>required to contribute to the conservation and enhancement of the significance of designated heritage assets and their settings.</p> <p>The amended Policy P14 states that some of the site allocations have identified possible sites for tall buildings in Peckham and Camberwell taking into account conservation areas and other heritage assets. This policy states that tall buildings must not cause a harmful impact on strategic views as set of in the London View Management Framework, or to our Borough views. This policy states that tall buildings must not cause a harmful impact on strategic views as set of in the London View Management Framework, or to our Borough views. This matter is explored in more detail in policy P23: World Heritage Sites. This policy states that the design of tall buildings will be required to contribute to the conservation and enhancement of the significance of designated heritage assets and their settings.</p>
<p>Individual NSPPSV116.4</p> <p>The policy is not effective because of conflicting NSP policy that seeks high density residential developments.</p> <p>Currently Conservation Area Appraisals are being ignored when planning applications come up in Conservation Areas, because the pressure to build residential accommodation, even when unaffordable, seems to override. There is nothing new in this policy that would change this status quo. The result of this conflict is that permission is being given for buildings that are out of scale in height and mass with the Conservation Area, eroding its settings, views and compromising historic character and distinctiveness.</p> <p>Some solution needs to be found to this if this policy P17 is to be made effective and</p>	<p>The Amended Policy P14: Tall buildings does not inherently conflict with this policy. The amended Policy P14 states that some of the site allocations have identified possible sites for tall buildings in Peckham and Camberwell taking into account conservation areas and other heritage assets. This policy states that tall buildings must not cause a harmful impact on strategic views as set of in the London View Management Framework, or to our Borough views. This matter is explored in more detail in policy P23: World Heritage Sites. This policy states that the design of tall buildings will be required to contribute to the conservation and enhancement of the significance of designated heritage assets and their settings.</p>

sound. One way for example might be to add something on the following lines.

3.2 When any developments are proposed that breach the prevailing heights, mass and density in a Conservation Area, this should be subject to additional public consultation before any such developments can be determined.

Organisation: Dulwich Society  
NSPPSV119.4

I write as a member of the Dulwich Society. My comments relate to the Development Management Policies covering aspects of the historic environment.

At the outset, I am bound to suggest that the Plan is basically unsound because it fails to take on the emerging policies and proposals contained in the Draft London Plan. This is a matter of timing, and in no sense represents an error of judgement on the part of Southwark. Ideally therefore, we suggest that the Plan be withdrawn pending the outcome of the EIP into the London Plan. Failure to do so, will mean that the Plan will subsequently require substantial amendment, because the approach adopted in the new London Plan differs markedly from that of its predecessor.

The Society's comments on the Development Management policies are as follows:

P17 Conservation areas.

It is important to note here that, although conservation area designation is usually a local matter, and such assets are considered to be of local importance only, yet there are examples in Southwark which are of national, and in some cases, international importance, where development proposals need to be considered with the utmost stringency. Similarly, we suggest that the 1990 Act be revisited to the effect that 'Special attention be paid to the desirability of preserving or enhancing the character or appearance of that area'.

Individual

Representation noted. The NSP will be revised taking on comments given to ensure that policies and design guidance is sound, and ensuring compliance with the NPPF & London Plan. The NSP is being prepared with regard to policies and proposals contained in the Draft London Plan. The NSP P21: World Heritage Sites addresses sites which are of an international importance.

NSPPSV126.4

The policy is not effective because of conflicting NSP policy that seeks high density residential developments.

Currently Conservation Area Appraisals are being ignored when planning applications come up in Conservation Areas, because the pressure to build residential accommodation, even when unaffordable, seems to override. There is nothing new in this policy that would change this status quo. The result of this conflict is that permission is being given for buildings that are out of scale in height and mass with the Conservation Area, eroding its settings, views and compromising historic character and distinctiveness.

Some solution needs to be found to this if this policy P17 is to be made effective and sound. One way for example might be to add something on the following lines.

3.2 When any developments are proposed that breach the prevailing heights, mass and density in a Conservation Area, this should be subject to additional public consultation before any such developments can be determined.

The Amended Policy P14: Tall buildings does not inherently conflict with this policy. The amended Policy P14 states that some of the site allocations have identified possible sites for tall buildings in Peckham and Camberwell taking into account conservation areas and other heritage assets. This policy states that tall buildings must not cause a harmful impact on strategic views as set of in the London View Management Framework, or to our Borough views. This matter is explored in more detail in policy P23: World Heritage Sites. This policy states that the design of tall buildings will be required to contribute to the conservation and enhancement of the significance of designated heritage assets and their settings.

Individual  
NSPPSV130.4

The policy is not effective because of conflicting NSP policy that seeks high density residential developments.

Currently Conservation Area Appraisals are being ignored when planning applications come up in Conservation Areas, because the pressure to build residential accommodation, even when unaffordable, seems to override. There is nothing new in this policy that would change this status quo. The result of this conflict is that permission is being given for buildings that are out of scale in height and mass with the Conservation Area, eroding its settings, views and compromising historic character and

The Amended Policy P14: Tall buildings does not inherently conflict with this policy. The amended Policy P14 states that some of the site allocations have identified possible sites for tall buildings in Peckham and Camberwell taking into account conservation areas and other heritage assets. This policy states that tall buildings must not cause a harmful impact on strategic views as set of in the London View Management Framework, or to our Borough views. This matter is explored in more detail in policy P23: World Heritage Sites. This policy states that the design of tall buildings will be

<p>distinctiveness.</p> <p>Some solution needs to be found to this if this policy P17 is to be made effective and sound. One way for example might be to add something on the following lines.</p> <p>3.2 When any developments are proposed that breach the prevailing heights, mass and density in a Conservation Area, this should be subject to additional public consultation before any such developments can be determined.</p>	<p>required to contribute to the conservation and enhancement of the significance of designated heritage assets and their settings.</p>
<p>Individual NSPPSV132.4</p> <p>The policy is not effective because of conflicting NSP policy that seeks high-density residential developments.</p> <p>Currently Conservation Area Appraisals are being ignored when planning applications come up in Conservation Areas, because the pressure to build residential accommodation, even when unaffordable, seems to override. There is nothing new in this policy that would change this status quo. The result of this conflict is that permission is being given for buildings that are out of scale in height and mass with the Conservation Areas, eroding their settings, views and compromising the historic character and distinctiveness.</p> <p>DETAIL / PROPOSED CHANGES</p> <p>When any developments are proposed that breach the prevailing heights, mass and density in a Conservation Area, this should be subject to additional public consultation before any such developments can be determined.</p>	<p>Southwark’s policies in the NSP and anticipated growth targets are supported by our AMR, LDD data, site methodology paper and our Growth model paper. These documents help set our projections of estimated housing to be delivered in the Borough and capacity for retail/employment. The Amended Policy P14: Tall buildings does not inherently conflict with this policy. The amended Policy P14 states that some of the site allocations have identified possible sites for tall buildings in Peckham and Camberwell taking into account conservation areas and other heritage assets. This policy states that tall buildings must not cause a harmful impact on strategic views, as set of in the London View Management Framework, or to our Borough views. This policy also states that the design of tall buildings will be required to avoid unacceptable harm to the significance of designated heritage assets or their settings. It should be acknowledged that Southwark Council’s SCI is currently in the process of being updated and improvements to our ways of communicating with residents shall be a key focal point of this.</p>
<p>Individual NSPPSV134.2</p>	

The policy isn't effective because of conflicting policy that seeks high density and enables disproportioned heights to new developments for housing uses, eroding conservation area's settings, views and compromising historic character and distinctiveness.

NSP prioritisation of housing needs is putting a lot of pressure in conservation and local historically important areas - negatively affecting character, distinctiveness and causing the loss of heritage buildings and historic environment.

To make this policy effective:

Densities and height of new developments should be established in conservation areas and capped at an adequate percentage (%) or number of floors above the existing streetscape to prevent conservation areas from being overridden by disproportioned building heights and densities that destroy local character and amenity. High densities can be achieved without tall buildings, and without compromising optimisation of development sites.

Alternatively, appraisal for specific sites suitable for tall buildings should be presented as part of the plan. Developments therefore would need to receive planning consent on their own merit, after consultation processes.

The Amended Policy P14: Tall buildings does not inherently conflict with this policy. The amended Policy P14 states that some of the site allocations have identified possible sites for tall buildings in Peckham and Camberwell taking into account conservation areas and other heritage assets. This policy states that tall buildings must not cause a harmful impact on strategic views as set of in the London View Management Framework, or to our Borough views. This matter is explored in more detail in policy P23: World Heritage Sites. This policy states that the design of tall buildings will be required to contribute to the conservation and enhancement of the significance of designated heritage assets and their settings.

Individual  
NSPPSV136.16

Policy 17 is not effective because of the conflicting NSP policy on tall buildings (Policy 14) that seeks high density residential development in most parts of the borough. The experience of recent years indicates that planning decisions favour residential development at the expense of the protection of designated conservation areas. This can be seen in the Rye Lane Peckham Conservation Area, where planning permission has been granted for buildings which manifestly go against the letter and the spirit of the local Conservation Area Appraisal. Residents have made substantial and repeated public objections to the Council but their objections have been dismissed. Southwark's Head of Planning told a meeting organised by the Peckham Townscape Heritage Initiative in February 2018 that having buildings that are taller than should be allowed in the Conservation Area was the price that had to be paid for providing housing.

The Amended Policy P14: Tall buildings does not inherently conflict with this policy. The amended Policy P14 states that some of the site allocations have identified possible sites for tall buildings in Peckham and Camberwell taking into account conservation areas and other heritage assets. This policy states that tall buildings must not cause a harmful impact on strategic views as set of in the London View Management Framework, or to our Borough views. This matter is explored in more detail in policy P23: World Heritage Sites. This policy states that the design of tall buildings will be required to contribute to the conservation and enhancement of the significance of designated heritage assets and their settings.

<p><b>Proposed changes</b>  This policy needs to be strengthened so that Conservation Area Appraisals are binding on Planning Officers and Planning Committees. Otherwise we are in danger of losing our valued built heritage.</p>	
<p><b>Organisation:</b> Peckham Heritage Regeneration Partnership.  NSPPSV139.2</p> <p>The policy is not effective because it conflicts with NSP policy for high density residential developments.</p> <p>Currently density, height and massing guidance in Conservation Area Appraisals is being overridden in the context of planning applications for new residential development. The result is that permission is being given for buildings that are overscaled and unsympathetic to the Conservation Areas, degrading historic significance and sense of place.</p> <p>To make this policy sound, an additional line could be added as follows:</p> <p>3.2 When developments are proposed that breach the prevailing heights, mass and density in a Conservation Area, and contravene Conservation Area Appraisal guidelines, additional public consultation should be carried out before any such developments can be determined.</p>	<p>The Amended Policy P14: Tall buildings does not inherently conflict with this policy. The amended Policy P14 states that some of the site allocations have identified possible sites for tall buildings in Peckham and Camberwell taking into account conservation areas and other heritage assets. This policy states that tall buildings must not cause a harmful impact on strategic views as set of in the London View Management Framework, or to our Borough views. This matter is explored in more detail in policy P23: World Heritage Sites. This policy states that the design of tall buildings will be required to contribute to the conservation and enhancement of the significance of designated heritage assets and their settings.</p>
<p><b>Individual</b>  NSPPSV145.3</p> <p>Related policy P17: Conservation areas (pg 44-45) could be strengthened by changing the wording to include the need for more extensive advertising of and public consultation on proposals that are brought forward that are higher than the prevailing existing townscape.</p>	<p>The amended Policy P14 states that some of the site allocations have identified possible sites for tall buildings in Peckham and Camberwell taking into account conservation areas and other heritage assets. This policy states that tall buildings must not cause a harmful impact on strategic views, as set of in the London View Management Framework, or to our Borough views. This policy also</p>

	<p>states that the design of tall buildings will be required to contribute to and enhance the significance of designated heritage assets or their settings. It should be acknowledged that Southwark Council's SCI is currently in the process of being updated and improvements to our ways of communicating with residents shall be a key focal point of this.</p>
<p>Individual NSPPSV146.3</p> <p>Related policy P17: Conservation areas (pg 44-45) could be strengthened by changing the wording to include the need for more extensive advertising of and public consultation on proposals that are brought forward that are higher than the prevailing existing townscape.</p>	<p>Policy P14 takes into account the detailed adverse impacts of tall buildings, including the necessity to avoid unacceptable harm to the significance of designated heritage assets or their settings. Nevertheless, the NSP will be revised taking on comments given to ensure that policies and all area visions with design guidance will be strengthened. It should be acknowledged that Southwark Council's SCI is currently in the process of being updated and improvements to our ways of communicating with residents shall be a key focal point of this.</p>
<p>Individual NSPPSV150.4</p> <p>The policy is not effective because of conflicting NSP policy that seeks high density residential developments.</p> <p>Currently Conservation Area Appraisals are being ignored when planning applications come up in Conservation Areas, because the pressure to build residential accommodation, even when unaffordable, seems to override. There is nothing new in this policy that would change this status quo. The result of this conflict is that permission is being given for buildings that are out of scale in height and mass with the Conservation Area, eroding its settings, views and compromising historic character and distinctiveness.</p> <p>Some solution needs to be found to this if this policy P17 is to be made effective and</p>	<p>The Amended Policy P14: Tall buildings does not inherently conflict with this policy. The amended Policy P14 states that some of the site allocations have identified possible sites for tall buildings in Peckham and Camberwell taking into account conservation areas and other heritage assets. This policy states that tall buildings must not cause a harmful impact on strategic views as set of in the London View Management Framework, or to our Borough views. This matter is explored in more detail in policy P23: World Heritage Sites. This policy states that the design of tall buildings will be required to contribute to the conservation and enhancement of the significance of designated heritage assets and their settings.</p>

<p>sound. One way for example might be to add something on the following lines.</p> <p>3.2 When any developments are proposed that breach the prevailing heights, mass and density in a Conservation Area, this should be subject to additional public consultation before any such developments can be determined.</p>	
<p>Individual NSPPSV151.12</p> <p>P17 As for policy P16, the wording should be revised to reflect the advice in NPPF.</p> <p>Amend as per the advice in the NPPF.</p>	<p>The NSP will be revised taking on comments given to ensure that policies and design guidance is sound, and ensuring compliance with the NPPF &amp; London Plan. The NSP is being prepared with regard to policies and proposals contained in the Draft London Plan</p>
<p>Organisation: Shad Thames Area Management Partnership NSPPSV161.3</p> <p>P17, pages 44-45 Conservation areas</p> <p>Not Effective</p> <p>The policy is not effective because of conflicting NSP policy that seeks high density residential developments.</p> <p>Currently Conservation Area Appraisals are being ignored when planning applications come up in Conservation Areas, because the pressure to build residential accommodation, even when unaffordable, seems to override. There is nothing new in this policy that would change this status quo. The result of this conflict is that permission is being given for buildings that are out of scale in height and mass with the Conservation Area, eroding its settings, views and compromising historic character and distinctiveness.</p>	<p>Policy P14 takes into account the detailed adverse impacts of tall buildings, including the necessity to avoid unacceptable harm to the significance of designated heritage assets or their settings. Nevertheless, the NSP will be revised taking on comments given to ensure that policies and all area visions with design guidance will be strengthened. It should be acknowledged that Southwark Council's SCI is currently in the process of being updated and improvements to our ways of communicating with residents shall be a key focal point of this.</p>

Some solution needs to be found to this if this policy P17 is to be made effective and sound. One way for example might be to add something on the following lines.

3.2 When any developments are proposed that breach the prevailing heights, mass and density in a Conservation Area, this should be subject to additional public consultation before any such developments can be determined.

Individual  
NSPPSV193.4

This policy is not effective because it does not ensure that the relevant specialist advice on the future viable use of the buildings and structures is available before a planning decision is made.

When development is proposed affecting listed buildings and/or structures, a detailed consultation plan, including appropriate specialist assessments and with extended timelines for appraisal, should be presented with planning applications.

Detail/ Proposed Changes.

The specialist interests to be consulted must include users and people and organisations knowledgeable about the appropriate industrial sector.

Representation noted. It is expected that any justification provided will be informed by specialist advice. It should be acknowledged that Southwark Council's SCI is currently in the process of being updated and improvements to our ways of communicating with residents shall be a key focal point of this.

Individual  
NSPPSV219.2

The policy is not effective because of conflicting NSP policy that seeks high density residential developments.

At present Conservation Area Appraisals are being ignored when planning applications come up in Conservation Areas, this is due to the demand to build residential accommodation, even when unaffordable. The NSP does nothing to address this problem. The result of this conflict is that permission is being given for buildings that are out of scale in height and mass with the Conservation Area, eroding its settings,

The Amended Policy P14: Tall buildings does not inherently conflict with this policy. The amended Policy P14 states that some of the site allocations have identified possible sites for tall buildings in Peckham and Camberwell taking into account conservation areas and other heritage assets. This policy states that tall buildings must not cause a harmful impact on strategic views as set of in the London View Management Framework, or to our Borough views. This matter is explored in more detail in policy P23: World Heritage

<p>views and compromising historic character and distinctiveness.</p> <p>Some solution needs to be found to this if this policy P17 is to be made effective and sound. One way for example might be to add something on the following lines.</p> <p>3.2 Proposed developments within a Conservation Area will have additional scrutiny and public consultation in place prior to any development plan being agreed.</p>	<p>Sites. This policy states that the design of tall buildings will be required to contribute to the conservation and enhancement of the significance of designated heritage assets and their settings.</p>
<p>Individual NSPPSV221.2</p> <p>The policy is not effective because of conflicting NSP policy that seeks high density residential developments.</p> <p>Currently Conservation Area Appraisals are being ignored when planning applications come up in Conservation Areas, because the pressure to build residential accommodation, even when unaffordable, seems to override. There is nothing new in this policy that would change this status quo. The result of this conflict is that permission is being given for buildings that are out of scale in height and mass with the Conservation Area, eroding its settings, views and compromising historic character and distinctiveness.</p> <p>Some solution needs to be found to this if this policy P17 is to be made effective and sound. One way for example might be to add something on the following lines.</p> <p>3.2 When any developments are proposed that breach the prevailing heights, mass and density in a Conservation Area, this should be subject to additional public consultation before any such developments can be determined</p>	<p>The Amended Policy P14: Tall buildings does not inherently conflict with this policy. The amended Policy P14 states that some of the site allocations have identified possible sites for tall buildings in Peckham and Camberwell taking into account conservation areas and other heritage assets. This policy states that tall buildings must not cause a harmful impact on strategic views as set of in the London View Management Framework, or to our Borough views. This matter is explored in more detail in policy P23: World Heritage Sites. This policy states that the design of tall buildings will be required to contribute to the conservation and enhancement of the significance of designated heritage assets and their settings.</p>
<p>Individual NSPPSV228.3</p>	

The policy is not effective because of conflicting NSP policy that seeks high density residential developments.

Currently Conservation Area Appraisals are being ignored when planning applications come up in Conservation Areas, because the pressure to build residential accommodation, even when unaffordable, seems to override. There is nothing new in this policy that would change this status quo. The result of this conflict is that permission is being given for buildings that are out of scale in height and mass with the Conservation Area, eroding its settings, views and compromising historic character and distinctiveness.

Some solution needs to be found to this if this policy P17 is to be made effective and sound. One way for example might be to add something on the following lines.

3.2 When any developments are proposed that breach the prevailing heights, mass and density in a Conservation Area, this should be subject to additional public consultation before any such developments can be determined.

Individual  
NSPPSV330.1

The NSP is unsound because it fails to justify destruction of existing older buildings in areas that, due to significant damage in the second world war, have very few historic buildings left.

Recently a 1930s block within the area NSP48 was demolished. Further developments planned in this designated site include further loss of historic buildings and their interiors. Though they may not initially seem of great historic significance, they represent what remains of the Elephant & Castle areas links to its past. The architecture that has been employed on many of the new high rise buildings in the area is completely out of character, either with what is currently in place, or what is being built. This has created no sense of defined character for the area, which becomes

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Representation has been acknowledged. The NSP will be amended to strengthen the design guidance to ensure compliance with the NPPF & London Plan. Amendments will show a reflection of development sites in conservation areas, with listed buildings and heritage assets, in addition to buildings of important significance.

increasingly uglier by the passing planning permissions.

Without retention of more historic buildings, we will lose our connection with the past, and have no real sense of what Elephant & Castle was. The Council's (and developers') desire to rebirth the 'Piccadilly of the South' is actually turning Elephant & Castle into the Westfield of the South. No one who comes to the area will know it from any other.

To visit Trinity Square, one is now stunned to see on all of its sides enormous high rise buildings (each over 20 storeys) appearing over the neat early Victorian roofs.

I would also bring your attention to P11, which requires design:

- Better reveal local distinctiveness and architectural character;
- Ensure the urban grain and site layout take account of and improve existing patterns of development and movement, permeability and street widths

Neither of these have been well managed as regards the developments around the Elephant & Castle, such that it is not reasonable to assume that the Council planning department is able to manage its own policy in this area.

The NSP should use existing historic structures as touchstones in the unfolding development of the area. This is particularly true as regards the number of very high buildings, which have created great inconsistency.

Pre-1940s buildings should be retained where possible. Postwar buildings should be reviewed, and a selection of key structures of different sorts (ie residential, retail, office) should be signalled as needing to be retained.

The loss of our architectural heritage should be a consideration within policies P16 and P17.

Representation	Officer Response
<p data-bbox="185 722 1133 756">P18: Conservation of the historic environment and natural heritage Land</p> <p data-bbox="185 764 716 834">Organisation: Bankside Residents Forum NSPPSV19.15</p> <p data-bbox="185 914 1229 1053">The policy is not effective because it is inconsistent with national policy in the NPPF which includes heritage assets included on the Local List. It fails to explain how without a Local List, unlisted buildings and heritage assets will be protected and enhanced by new development, and so not able to achieve its aim.</p> <p data-bbox="185 1094 1200 1272">The policy recognises the existence of conservation and heritage assets that are not protected under the Planning (Listed Buildings and Conservation Areas) Act 1990 but does not provide for a Local List which is the nationally recognised method for giving them protection. These quotes are from Historic England : <a href="https://historicengland.org.uk/listing/what-is-designation/local/local-designations">https://historicengland.org.uk/listing/what-is-designation/local/local-designations</a></p> <p data-bbox="185 1310 1200 1377">“Local lists play an essential role in building and reinforcing a sense of local character and distinctiveness in the historic environment. Local lists can be used to identify</p>	<p data-bbox="1261 909 2051 1190">Representation has been acknowledged. All NSP policies will be amended to strengthen the design guidance to ensure compliance with the NPPF &amp; London Plan. Amendments will show a reflection of development sites in conservation areas, with listed buildings and heritage assets, in addition to buildings of important significance. All evidence base background papers will be made public alongside the final submission of the NSP and will include a local list as part of the Heritage SPD.</p>

significant local heritage assets to support the development of Local Plans. Encouraging the use of local lists will strengthen the role of local heritage assets as a material consideration in the planning process...

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

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

This was recognised in earlier planning policy documents:

\* The adopted version of the Elephant & Castle SPD from March 2012 states (4.5.12) that "We (Southwark) will be consulting on our local list in summer 2012. The local list will be established through that process".

\* The Peckham and Nunhead AAP 4.7.12 (2014) states “... we have also identified buildings which are worthy of being added to the council’s local list. The local list identifies buildings and structures with local value which make a positive contribution to character or appearance due to ... .. Buildings on the local list in Peckham & Nunhead include ... ..” The Fact Box Page 98 refers to the NPPF definition of heritage assets including locally listed buildings, and gives English Heritage good practice guidance on the criteria to use to identify buildings and other objects for the Southwark ‘Local List’.

\* The NSP Options version from October 2014, Draft Policies and area visions states – “DM55 Local list buildings and views: Southwark will have a list of locally important

buildings, structures and views that positively contribute to local character and amenity.  
 DM55.1 Development must take these locally important buildings, structures and views into account.  
 Reasons: Locally important buildings and views make a positive contribution to local character and distinctiveness, but they do not benefit from a statutory designation. We will prepare a list of locally important buildings and views, and the criteria for their selection as part of a Heritage SPD.”

There has been no explanation why the provision for a Local List does not appear in the NSP submission version.

This policy could be made sound by including in it two additional points to achieve the following:

2. Unlisted buildings of townscape merit and undesignated heritage assets identified and gathered in a Local List and allowed the same protection as listed buildings and/or conservation areas.
3. A community engagement policy developed to encourage local neighbourhoods to develop a local process with an existing community group or a new group to nominate buildings for the Local List.

Organisation: Berkeley Homes (South East London)  
 NSPPSV21.7

It would be helpful for Policy P17 and P18 to be considered alongside Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) to bring consistency in approach.

Representation noted. The NSP will be revised taking on comments given to ensure that policies and design guidance is sound, and ensuring compliance with the NPPF & London Plan. It is viewed that the policy is in conformity with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended).

Organisation: Bermondsey Street Area Partnership

The policy is not effective because it is inconsistent with national policy in the NPPF which includes heritage assets included on the Local List. It fails to explain how without a Local List, unlisted buildings and heritage assets will be protected and enhanced by new development, and so not able to achieve its aim.

The policy recognises the existence of conservation and heritage assets that are not protected under the Planning (Listed Buildings and Conservation Areas) Act 1990 but does not provide for a Local List which is the nationally recognised method for giving them protection. These quotes are from Historic England :

<https://historicengland.org.uk/listing/what-is-designation/local/local-designations>

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

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

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

This was recognised in earlier planning policy documents:

\* The adopted version of the Elephant & Castle SPD from March 2012 states (4.5.12)

Representation has been acknowledged. All NSP policies will be amended to strengthen the design guidance to ensure compliance with the NPPF & London Plan. Amendments will show a reflection of development sites in conservation areas, with listed buildings and heritage assets, in addition to buildings of important significance. All evidence base background papers will be made public alongside the final submission of the NSP and will include a local list as part of the Heritage SPD.

that "We (Southwark) will be consulting on our local list in summer 2012. The local list will be established through that process".

\* The Peckham and Nunhead AAP 4.7.12 (2014) states "... we have also identified buildings which are worthy of being added to the council's local list. The local list identifies buildings and structures with local value which make a positive contribution to character or appearance due to ... Buildings on the local list in Peckham & Nunhead include ... ." The Fact Box Page 98 refers to the NPPF definition of heritage assets including locally listed buildings, and gives English Heritage good practice guidance on the criteria to use to identify buildings and other objects for the Southwark 'Local List'.

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DM55.1 Development must take these locally important buildings, structures and views into account.

Reasons: Locally important buildings and views make a positive contribution to local character and distinctiveness, but they do not benefit from a statutory designation. We will prepare a list of locally important buildings and views, and the criteria for their selection as part of a Heritage SPD."

There has been no explanation why the provision for a Local List does not appear in the NSP submission version.

This policy could be made sound by including in it two additional points to achieve the following:

2. Unlisted buildings of townscape merit and undesignated heritage assets identified and gathered in a Local List and allowed the same protection as listed buildings and/or conservation areas.
3. A community engagement policy developed to encourage local neighbourhoods to

<p>develop a local process with an existing community group or a new group to nominate buildings for the Local List.</p>	
<p>Individual NSPPSV40.12</p> <p>As this policy recognises, there are many conservation and heritage assets that do not get awarded the protection they deserve, so are not protected under the Planning Act 1990 (Listed Buildings and Conservation Areas).</p> <p>Amongst other things, communities place a great deal of importance on existing (built) structures, no matter if it is an arch, viaduct, house, tower block or some other construction, with much significance given to honouring an architect's original interpretation of a place. As well as the value of the emotional ties and attachments a community might have for a structure and the life it is given by that community.</p> <p>Local List are an essential acknowledgement of this and the value a community places on individual buildings and structures within it. However there is no longer the provision in Southwark for a Local List. It is a nationally recognised method for giving them protection. So to make this policy sound it needs to be reinstated.</p>	<p>Representation has been acknowledged. All NSP policies will be amended to strengthen the design guidance to ensure compliance with the NPPF &amp; London Plan. Amendments will show a reflection of development sites in conservation areas, with listed buildings and heritage assets, in addition to buildings of important significance. All evidence base background papers will be made public alongside the final submission of the NSP and will include a local list as part of the Heritage SPD.</p>
<p>Individual NSPPSV99.5</p> <p>The policy is not effective because it is inconsistent with national policy in the NPPF which includes heritage assets included on the Local List. It fails to explain how without a Local List, unlisted buildings and heritage assets will be protected and enhanced by new development, and so not able to achieve its aim.</p> <p>The policy recognises the existence of conservation and heritage assets that are not protected under the Planning (Listed Buildings and Conservation Areas) Act 1990 but does not provide for a Local List which is the nationally recognised method for giving</p>	<p>Representation has been acknowledged. All NSP policies will be amended to strengthen the design guidance to ensure compliance with the NPPF &amp; London Plan. Amendments will show a reflection of development sites in conservation areas, with listed buildings and heritage assets, in addition to buildings of important significance. All evidence base background papers will be made public alongside the final submission of the NSP and will include a local list as part of the Heritage SPD.</p>

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

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

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

Continued

This was recognised in earlier planning policy documents:

\* The adopted version of the Elephant & Castle SPD from March 2012 states (4.5.12) that "We (Southwark) will be consulting on our local list in summer 2012. The local list will be established through that process".

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3. A community engagement policy developed to encourage local neighbourhoods to develop a local process with an existing community group or a new group to nominate buildings for the Local List.

Individual  
NSPPSV116.5

The policy is not effective because it is inconsistent with national policy in the NPPF which includes heritage assets included on the Local List. It fails to explain how without a Local List, unlisted buildings and heritage assets will be protected and enhanced by

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new development, and so not able to achieve its aim.

The policy recognises the existence of conservation and heritage assets that are not protected under the Planning (Listed Buildings and Conservation Areas) Act 1990 but does not provide for a Local List which is the nationally recognised method for giving them protection. These quotes are from Historic England :

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Individual  
NSPPSV126.5

The policy is not effective because it is inconsistent with national policy in the NPPF which includes heritage assets included on the Local List. It fails to explain how without a Local List, unlisted buildings and heritage assets will be protected and enhanced by new development, and so not able to achieve its aim.

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3. A community engagement policy developed to encourage local neighbourhoods to develop a local process with an existing community group or a new group to nominate buildings for the Local List.

Individual  
NSPPSV130.5

The policy is not effective because it is inconsistent with national policy in the NPPF which includes heritage assets included on the Local List. It fails to explain how without a Local List, unlisted buildings and heritage assets will be protected and enhanced by new development, and so not able to achieve its aim.

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environment extends beyond the confines of the planning system to recognise those community-based values that contribute to our sense of place.

Continued

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Individual  
NSPPSV132.5

With regards to the decision not to have a borough wide local list:

- Due to obvious gaps and inconsistencies - see below
- The policy is not effective because it is inconsistent with national policy in the NPPF which includes heritage assets included on the Local List. It fails to explain how without a Local List, unlisted buildings and heritage assets will be protected and enhanced by new development, and so not able to achieve its aim.
- No clear audit trail of how the preferred approach was arrived at while the consultation

that has taken place has not allowed for effective engagement - see below

The policy recognises the existence of conservation and heritage assets that are not protected under the Planning (Listed Buildings and Conservation Areas) Act 1990 but does not provide for a Local List which is the nationally recognised method for giving them protection.

Many other councils have borough wide Local Lists ( Camden, Croydon, Tower Hamlets, Lambeth and Hackney...) informed by Historic England guidance:

“Local lists play an essential role in building and reinforcing a sense of local character and distinctiveness in the historic environment. Local lists can be used to identify

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significant local heritage assets to support the development of Local Plans. Encouraging the use of local lists will strengthen the role of local heritage assets as a material consideration in the planning process...

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

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

<https://historicengland.org.uk/listing/what-is-designation/local/local-designations>

This issue was raised with the council by the Forum in September 2017 and many times since including in a Public Question at Council Assembly on Nov 29th and a follow up meeting in January at the planning department where clarifications were promised but not subsequently honoured to make clear the council’s position and the process that had been undertaken. It was at least admitted that there are gaps in policy in areas not covered by the combination of AAPs, SPDs, Conservation Areas and Neighbourhood Plans however the question as to what disadvantages there are to having a borough wide local list has been continually avoided. Despite an FOIA request on the subject no audit trail has been made available to explain why members decided to remove policy DM55 “Local List buildings and views” from the Options version from October 2014. Despite the Peckham and Nunhead AAP 2014 and the adopted version of the Elephant & Castle SPD from March 2012 for example making specific reference to local lists the local list policy has been dropped from the NSP and those officers from whom the audit trail has been requested (the Planning Policy Manager, the Head of Planning and the Cabinet Member for Regeneration and Homes) have variously admitted to not being familiar with key guidance on the subject like “Historic England Advice Note 7” for example which sets out how according to appropriate selection methods and criteria, locally identified assets in the context of Conservation Areas can benefit from an

elevated protection - namely the general control over demolition afforded by the Planning (Listed Buildings and Conservation) Act 1990. It would appear that the council have not therefore considered either the disadvantages nor the (full) advantages to having a borough wide local list.

#### DETAIL / PROPOSED CHANGES

For the plan to be sound a new genuine consultation should be had on the subject of a borough wide local list. In advance of this the emerging local lists of in neighbourhood plans like that of the OBF should be given their due weight in the planning process and used as front runners to help develop an appropriate community engagement strategy for a borough wide policy of such great potential value in promoting sustainable development.

Individual  
NSPPSV134.3

The policy is not effective, it recognises the existence of conservation and heritage assets that are not protected under the Planning (Listed Buildings and Conservation Areas) Act 1990 but fails to further explain how these will be protected and enhanced by new development hence not achieving its aim.

To achieve the aims of the policy:

Unlisted buildings of townscape merit and undesignated heritage assets should be identified and gathered in a Local List\* and allowed the same protection as listed buildings and/or conservation areas.

\*Local Lists can be made in partnership with local residents through occasional appraisal and/or a nomination system which recognises and takes advantage of local residents' knowledge, and highlights community value assets.

Organisation: Peckham Heritage Regeneration Partnership.  
NSPPSV139.3

Representation has been acknowledged. All NSP policies will be amended to strengthen the design guidance to ensure compliance with the NPPF & London Plan. Amendments will show a reflection of development sites in conservation areas, with listed buildings and heritage assets, in addition to buildings of important significance. All evidence base background papers will be made public alongside the final submission of the NSP and will include a local list as part of the Heritage SPD.

Not justified

(i) The policy is not sound because of the absence of locally listed buildings from the heritage assets identified.

There has been no recent consultation on whether there should be a local list in Southwark. The PHRP now proposes that a local list for Southwark should be consulted on. There has been no explanation why the provision for a Local List does not appear in the NSP submission version.

(ii) Not consistent with national policy

(ii) The policy is not sound because it is not consistent with national policy as set out in the National Planning Policy Framework

The National Planning Policy Framework frequently refers to 'heritage asset(s)' in Section 12. Conserving and enhancing the historic environment. The NPPF itself defines 'heritage asset' (see Annex 2. Glossary) as:

"a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing)" (bold text is ours).

Given the above definition, it can be argued that the local list is integral to the set of buildings, parks and spaces termed 'heritage asset'.

The NPPF encourages sustainable development, refers to "spirit of place" and aims to reinforce the inclusion of people and communities in decision making and neighbourhood planning. (e.g. see Ministerial foreword, NPPF). Compiling a local list is a way of engaging and supporting community values and interest. Compiling a local list gives local people and communities an opportunity to explore and set out what they value in their built environment.

This policy could be made sound by including in it two additional points to achieve the following:

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1. Unlisted buildings of townscape merit and undesignated heritage assets identified and gathered in a Local List.  
Local listing should be a material consideration in planning decisions.
2. A community engagement policy developed to encourage local neighbourhoods to develop a local process with an existing community group or a new group to nominate buildings for the Local List.

Organisation: Peckham Society  
NSPPSV140.8

Development must:  
 . 1.1 Conserve and enhance the significance of the following heritage assets and their settings:  
 Unlisted buildings of townscape merit; and  
 'Unlisted buildings of townscape merit'  
 PS believes this is unsound as there is no local list to refer to

Representation has been acknowledged. All NSP policies will be amended to strengthen the design guidance to ensure compliance with the NPPF & London Plan. Amendments will show a reflection of development sites in conservation areas, with listed buildings and heritage assets, in addition to buildings of important significance. All evidence base background papers will be made public alongside the final submission of the NSP and will include a local list as part of the Heritage SPD.

Organisation: Port of London Authority  
NSPPSV143.4

4. Policy P18: Conservation of the Historic Environment and Natural Heritage  
  
 The PLA note that the policy includes reference to conserving and enhancing the

Support noted.

foreshore and river structures, and their settings, which is supported, however please see below under policy P22 on the River Thames regarding access to the River Thames Foreshore.

Individual  
NSPPSV150.3

P18, page 45

Conservation of the historic environment and natural heritage

Not Effective

The policy is not effective because it is inconsistent with national policy in the NPPF which includes heritage assets included on the Local List. It fails to explain how without a Local List, unlisted buildings and heritage assets will be protected and enhanced by new development, and so not able to achieve its aim.

The policy recognises the existence of conservation and heritage assets that are not protected under the Planning (Listed Buildings and Conservation Areas) Act 1990 but does not provide for a Local List which is the nationally recognised method for giving them protection. These quotes are from Historic England :  
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This was recognised in earlier planning policy documents:

\* The adopted version of the Elephant & Castle SPD from March 2012 states (4.5.12) that "We (Southwark) will be consulting on our local list in summer 2012. The local list will be established through that process".

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Organisation: Shad Thames Area Management Partnership  
NSPPSV161.4

P18, page 45  
Conservation of the historic environment and natural heritage

Not Effective

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2. Unlisted buildings of townscape merit and undesignated heritage assets identified and gathered in a Local List and allowed the same protection as listed buildings and/or conservation areas.
3. A community engagement policy developed to encourage local neighbourhoods to develop a local process with an existing community group or a new group to nominate buildings for the Local List.

Organisation: Team London Bridge  
NSPPSV179.6

20. We commend the positive approach to the importance of Southwark’s historic environment and key views in the suite of Policies P16, 17, 18, 19 , 20 and 21. We also support recognition of the importance of “placemarks” in the London Bridge Area Vision.

Support noted. Although 'placemarks' are not included in the list of heritage assets that development must conserve and enhance, the policy recognises 'undesignated heritage assets'. This could include 'placemarks' of particular heritage value. P19 will not be amended

<p>21. Team London Bridge is working with Shad Thames Area Management Partnership and Bermondsey Street Area Partnership to identify valued views and other placemarks that shape the character of our areas. This includes an online mapping survey in which people are identifying the Placemarks (<a href="https://placemarks.commonplace.is/">https://placemarks.commonplace.is/</a>) that matter to them. This review has shown that people value not only views but also important buildings, open spaces, trees, public art, street furniture, rights of way, signs, names and many other things that contribute to local character. A majority of these are not recognised in planning or heritage policy or legislation.</p> <p>22. We believe the value of placemarks as recognised in the London Bridge Area Vision needs to be delivered through the inclusion of placemarks in the list of assets acknowledged in Policy P18, a strengthening of Policy P19 and preparation of a Supplementary Planning Document to provide clarity on the purpose and role of placemarks.</p> <p>Recommendations</p> <ul style="list-style-type: none"> <li>• Amend Policy P18 to include “placemarks” in the list of assets in section 1.1</li> <li>• Amend Policy P19 to include views of “placemarks” alongside “significant landmarks and townscape” as being views that must be enhanced by development</li> <li>• Support preparation of a Supplementary Planning Document on placemarks</li> </ul>	<p>to include reference to placemarks as it is currently robust enough and appropriately to cover such heritage assets.</p>
<p>Individual NSPPSV193.2</p> <p>P14 is not compliant with the current 2016 consolidation Plan Policy 7.7 which states: “Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations”.</p> <p>“Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks”.</p> <p>By contrast the NSP effectively indicates that tall buildings can be located anywhere in</p>	<p>The amended Policy P14 states that some of the site allocations have identified possible sites for tall buildings in Peckham and Camberwell taking into account conservation areas and other heritage assets. This policy states that tall buildings must not cause a harmful impact on strategic views, as set out in the London View Management Framework, or to our Borough views. This policy also states that the design of tall buildings will be required to avoid unacceptable harm to the significance of designated heritage assets or their settings. It should be acknowledged that Southwark Council's SCI is currently in the process of being updated and</p>

the Borough, (unless they interfere with strategic / borough views) and does not indicate any attempt to identify locations in conjunction with the Mayor.

similarly P14 is not compliant with the New Draft London Plan 2017 Policy D8 which states:

Part A: "Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".

By contrast the NSP gives no definition of a tall building in terms of height either generally or in location specific terms.

Part B "Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate". The NSP however includes no maps and/or corresponding heights thus failing to take a plan led approach. Evidence of participation of the local community is poor or entirely lacking / the consultation that has taken place has not allowed for effective engagement of all interested parties and there are gaps in the policy and the evidence base is not up to date:

The interplay of this policy with the site allocations policies which are too vague on this subject to be meaningful - referring only to "taller buildings" leave a significant gap in the policy (any commitment to actual heights) whereby the consultation responses on one are dismissed by the other: P180 of the consultation report dismisses in one stroke many informed local responses about a heritage setting (NSP53) with "Applications for tall buildings will be assessed against borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context." Thus the tall buildings policy makes it impossible for local opinion to be registered about site allocations on the subject of tall buildings.

The policy is not positively prepared as some aspects of the policy are vague or unclear, failing to properly define what would constitute a "tall building" while the phrase "significantly taller than the surroundings" is too vague to be in any way

improvements to our ways of communicating with residents shall be a key focal point of this. Tall buildings will be defined in relation to their existing and emerging context. The amended policy P14 Tall buildings provides a map indicating areas where we expect tall buildings.

useful. Furthermore it creates the potential for a domino effect in tall building because once one exists it defines the 'surroundings' for the next.

The 2011 Core strategy identified particular locations in the borough where tall buildings were appropriate, and this was supported by a Tall Buildings Research Paper (March 2010). No similar study has been undertaken to support the significantly different new policy that tall buildings may effectively be appropriate anywhere in the borough.

Organisation: LB Lambeth  
NSPPSV333.14

#### APPENDIX 1

This should consider including the views of adjoining boroughs where they cross Southwark. See schedule in Lambeth Local Plan Policy Q26. We can provide view cone data.

Annex 4 states that Southwark will continue to work closely with City of London, London Borough of Tower Hamlets and HE to ensure that development that may impact upon the significance or our Borough Views is appropriate and have regard to the purpose and scope of our views designations.

This does not appear to have considered Lambeth views

Organisation: Walworth Society  
NSPPSV207.1

I am writing on behalf of the Walworth Society in relation to this policy to state that the policy is unsound because it is inconsistent with national policy in the NPPF which includes heritage assets included on the Local List. It fails to explain how without a Local List, unlisted buildings and heritage assets will be protected and enhanced by new

This will be updated in a map in our Annex on Borough views.

Representation has been acknowledged. All NSP policies will be amended to strengthen the design guidance to ensure compliance with the NPPF & London Plan. Amendments will show a reflection of development sites in conservation areas, with listed buildings

development, and so not able to achieve its aim.

The need for and intention to create a Local List under the umbrella of a Heritage SPD is recognised by Historic England and was recognised in earlier planning policy documents:

\* The adopted version of the Elephant & Castle SPD from March 2012 states (4.5.12) that "We (Southwark) will be consulting on our local list in summer 2012. The local list will be established through that process".

\* The Peckham and Nunhead AAP 4.7.12 (2014) states "... we have also identified buildings which are worthy of being added to the council's local list. The local list identifies buildings and structures with local value which make a positive contribution to character or appearance due to ... Buildings on the local list in Peckham & Nunhead include ...". The Fact Box Page 98 refers to the NPPF definition of heritage assets including locally listed buildings, and gives English Heritage good practice guidance on the criteria to use to identify buildings and other objects for the Southwark 'Local List'.

\* The NSP Options version from October 2014, Draft Policies and area visions states – "DM55 Local list buildings and views: Southwark will have a list of locally important buildings, structures and views that positively contribute to local character and amenity.

DM55.1 Development must take these locally important buildings, structures and views into account.

Reasons: Locally important buildings and views make a positive contribution to local character and distinctiveness, but they do not benefit from a statutory designation. We will prepare a list of locally important buildings and views, and the criteria for their selection as part of a Heritage SPD."

There has been no explanation why the provision for a Local List does not appear in the NSP submission version.

and heritage assets, in addition to buildings of important significance. All evidence base background papers will be made public alongside the final submission of the NSP and will include a local list as part of the Heritage SPD.

This policy could be made sound by including in it two additional points to achieve the following:

2. Unlisted buildings of townscape merit and undesignated heritage assets identified and gathered in a Local List under the policy umbrella of an adopted Heritage SPD and allowed the same protection as listed buildings and/or conservation areas.
3. A community engagement policy developed to encourage local neighbourhoods to develop a local process with an existing community group or a new group to nominate buildings for the Local List.

We have a number of instances in the Walworth area of buildings that have been harmed owing to the lack of progress on this matter. These are buildings that are of historic value which should have received recognition in relation to the proposed local list in the E&C SPD which have experienced significant harm in the meanwhile. These include: The Hampton Court Palace Hotel, the Scene Painting warehouse on Penrose St, the Victorian Sorting Office on Penrose St, The Crown PH on Brandon St. The absence of the local list and the adopted planning policy to bring it into force means that this policy is currently unsound.

I am willing to take part at the oral examination/public hearings.

Individual  
NSPPSV219.3

The policy is not sound because it is inconsistent with national policy in the NPPF which includes heritage assets included on the Local List. The policy fails to explain how without a Local List, unlisted buildings and heritage assets will be protected and enhanced by new development, and so not able to achieve its aim.

The policy recognises the existence of conservation and heritage assets that are not protected under the Planning (Listed Buildings and Conservation Areas) Act 1990 but does not provide for a Local List which is the nationally recognised method for giving them protection. These quotes are from Historic England :

Representation has been acknowledged. All NSP policies will be amended to strengthen the design guidance to ensure compliance with the NPPF & London Plan. Amendments will show a reflection of development sites in conservation areas, with listed buildings and heritage assets, in addition to buildings of important significance. All evidence base background papers will be made public alongside the final submission of the NSP and will include a local list as part of the Heritage SPD.

<https://historicengland.org.uk/listing/what-is-designation/local/local-designations>

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

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

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

Continued

This was recognised in earlier planning policy documents:

\* The adopted version of the Elephant & Castle SPD from March 2012 states (4.5.12) that "We (Southwark) will be consulting on our local list in summer 2012. The local list will be established through that process".

\* The Peckham and Nunhead AAP 4.7.12 (2014) states “... we have also identified buildings which are worthy of being added to the council’s local list. The local list identifies buildings and structures with local value which make a positive contribution to character or appearance due to ... .. Buildings on the local list in Peckham & Nunhead include ... ..” The Fact Box Page 98 refers to the NPPF definition of heritage assets including locally listed buildings, and gives English Heritage good practice guidance on the criteria to use to identify buildings and other objects for the Southwark

'Local List'.

\* The NSP Options version from October 2014, Draft Policies and area visions states –  
“DM55 Local list buildings and views: Southwark will have a list of locally important buildings, structures and views that positively contribute to local character and amenity.

DM55.1 Development must take these locally important buildings, structures and views into account.

Reasons: Locally important buildings and views make a positive contribution to local character and distinctiveness, but they do not benefit from a statutory designation. We will prepare a list of locally important buildings and views, and the criteria for their selection as part of a Heritage SPD.”

There has been no explanation why the provision for a Local List does not appear in the NSP submission version.

This policy could be made sound by including in it two additional points to achieve the following:

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3. A community engagement policy developed to encourage local neighbourhoods to develop a local process with an existing community group or a new group to nominate buildings for the Local List.

Individual  
NSPPSV221.3

The policy is not effective because it is inconsistent with national policy in the NPPF which includes heritage assets included on the Local List. It fails to explain how without a Local List, unlisted buildings and heritage assets will be protected and enhanced by

Representation has been acknowledged. All NSP policies will be amended to strengthen the design guidance to ensure compliance with the NPPF & London Plan. Amendments will show a reflection

new development, and so not able to achieve its aim.

The policy recognises the existence of conservation and heritage assets that are not protected under the Planning (Listed Buildings and Conservation Areas) Act 1990 but does not provide for a Local List which is the nationally recognised method for giving them protection. These quotes are from Historic England :

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

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of development sites in conservation areas, with listed buildings and heritage assets, in addition to buildings of important significance. All evidence base background papers will be made public alongside the final submission of the NSP and will include a local list as part of the Heritage SPD.

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This was recognised in earlier planning policy documents:

Representation has been acknowledged. All NSP policies will be amended to strengthen the design guidance to ensure compliance with the NPPF & London Plan. Amendments will show a reflection of development sites in conservation areas, with listed buildings and heritage assets, in addition to buildings of important significance. All evidence base background papers will be made public alongside the final submission of the NSP and will include a local list as part of the Heritage SPD.

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<p>3. A community engagement policy developed to encourage local neighbourhoods to develop a local process with an existing community group or a new group to nominate buildings for the Local List.</p>	
<p>Individual NSPPSV287.2</p> <p>Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? - Legally compliant No</p> <p>Do you consider that the New Southwark Plan is sound? - Soundness No</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: - Do you consider that the New Southwark Plan is unsound because it is not: Justified</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: - Do you consider that the New Southwark Plan is unsound because it is not: Effective</p>	<p>Objection noted. The NSP has been prepared to ensure legal compliance with the NPPF &amp; London Plan.</p>
<p>Individual NSPPSV324.6</p> <p>Policy 18 is not effective because it is inconsistent with national policy in the NPPF which includes heritage assets included on the Local List. It fails to explain how without a Local List, unlisted buildings and heritage assets will be protected and enhanced by</p>	<p>Representation has been acknowledged. All NSP policies will be amended to strengthen the design guidance to ensure compliance with the NPPF &amp; London Plan. Amendments will show a reflection</p>

new development, and so not able to achieve its aim. There has been no explanation why the provision for a Local List does not appear in the NSP submission version, despite appearing in the NSP Options version from October 2014 (DM55, DM55.1).

This policy could be made sound by including in it two additional points to achieve the following:

2. Unlisted buildings of townscape merit and undesignated heritage assets identified and gathered in a Local List and allowed the same protection as listed buildings and/or conservation areas.
3. A community engagement policy developed to encourage local neighbourhoods to develop a local process with an existing community group or a new group to nominate buildings for the Local List.

of development sites in conservation areas, with listed buildings and heritage assets, in addition to buildings of important significance. All evidence base background papers will be made public alongside the final submission of the NSP and will include a local list as part of the Heritage SPD.

## Representation

### P19: Borough views

Organisation: Bankside Residents Forum  
NSPPSV19.16

While P19 provides some clarity on the key views, there are other views that have failed to be incorporated especially views of Southwark Cathedral. Although the fact box describes the types of protected views, there is clearly more work to be done on this to ensure that the policy is sound. Often it is only when view is lost that people take regard to the significance of having robust policy in place. We would like to see more emphasis placed on producing a supplementary planning document of protected views similar to that produced by the City of London so that there is a clearer understanding of impact for developers.

We would particularly draw your attention to the following section 3 from the City's SPD - Qualitative View Protection – River Prospects

3.3 Other designated strategic views have precisely defined assessment points but are protected by qualitative assessment of the impact of a proposal on the important elements of the view. For the City, most of the relevant views are 'River Prospects' from Thames bridges and the riverside walk.

3.4 The management of River Prospects should ensure that the juxtaposition between elements, including the river frontage and landmarks, is appreciated within a wider London context. Development must ensure that key features of the view can continue to be enjoyed in the context of their surrounding environment, including distant buildings.

3.5 Development in the foreground and middle ground of the River Prospects should enhance the juxtaposition of townscape elements with the riverbanks and the depth and variety of the surrounding London townscape. Interventions into the built fabric should preserve or, where possible, enhance this relationship. Development in the

Borough views are significant views and panoramas that make a positive contribution to experiencing Southwark's environment within London, informing how we are located in an historic and important world city. Southwark Cathedral is a Grade I listed building and is set within the Borough High Street Conservation Area. P17 Conservation Areas states that development relating to conservation areas will only be granted where the development conserves and enhances the significance of a conservation area's setting, including views to and from the conservation area.

The NSP has been prepared to ensure that policies and design guidance is sound, and ensuring conformity with the NPPF & London Plan. P19: Borough Views, alongside P14: Tall Buildings, Annex 4: Borough Views, and the London View Management Framework will ensure that development is appropriate and maintains Southwark's Borough views.

Annex 4: Borough Views has been updated so that the proposed view geometry is consistent with the approach taken in the London View Management Framework, this Annex provides further information on each of our Borough Views. In particular, a defined assessment point, Landmark Viewing Corridors and Wider Setting Consultation Areas; the coordinates for each piece of geometry are set out in this Annex. The annex also provides a qualitative assessment of each Borough View. This policy will be updated to refer to Annex 4 - Borough Views.

foreground or middle ground that is overly intrusive, unsightly or prominent to the detriment of the view as a whole should be refused.

3.6 Some River Prospects include views of the Tower of London World Heritage Site. New development in the background of a River Prospect should, where relevant, preserve or enhance a viewer's ability to appreciate the Outstanding Universal Value of a World Heritage Site and should be consistent with the objectives of the World Heritage Site Management Plan.

Organisation: City of London  
NSPPSV34.1

Thank you for the opportunity to respond to the submission version of the New Southwark Plan. We understand this is the council's final document for consideration and not an open consultation for discussion and comment.

The City of London notes the borough's proposed submission version (December 2017) in regard to the New Southwark Plan. We were previously consulted on the Preferred Options and responded with comments in February 2016.

We welcome the addition of inclusion of views relating to other boroughs, strategic views and wider views. Including the acknowledgement of the City's St. Paul's Heights as many of the views of the Cathedral protected by the Heights are from Southwark.

The City of London Corporation is keen to maintain strong links with the London Borough of Southwark and to continue to cooperate in the development of our respective Local Plan policies, especially those related to cross boundary issues and the Central Activities Zone. The City of London is currently working on a draft version of a new Local Plan and will be running its own consultation in autumn 2018.

Individual  
NSPPSV40.13

Positive representation acknowledged.

This policy is not positively prepared because it does not afford protection to the London panorama as seen when looking north from the rooftops of the Peckham Multi Storey building and the Bussey building in Peckham town centre.

These rooftops have become strongly associated with the now famous panoramic view of London, as described above. They provide significant viewing spaces where thousands of visitors come to visit and experience the views, which are now synonymous with Peckham's social infrastructure and local economy, so much so that it needs protection in this policy.

In Southwark, our London Panorama and two Linear views all focus on St Paul's Cathedral as the Strategically Important Landmark. P19: Borough Views, View 5 - One Tree Hill ensures that the ability to recognise and appreciate St Paul's Cathedral within the wider panorama is preserved and enhanced. The Landmark Viewing Corridor and Wider Setting Consultation Areas from this view, of which development must not exceed a specified threshold, protects a viewing corridor over the view from the Bussey Building to the city. The view from the Bussey Building is given further protection in the site allocation NSP75, which states that development massing should minimise the impact on the view to the City from the Bussey Building rooftop. A further 20m height restriction is also placed on development proposals to conform to the guidance set out in the Peckham and Nunhead Area Action Plan.

The Bussey Building is set within the Rye Lane Conservation Area. P17 Conservation Areas states that development relating to conservation areas will only be granted where the development conserves and enhances the significance of a conservation area's setting, including views to and from the conservation area.

Individual  
NSPPSV56.11

This policy is not positively prepared because it does not include protection for the London panorama from the rooftops of the Peckham Multi Storey building and the Bussey Building in Peckham town centre.

This view is similar to that from One Tree Hill and Nunhead Cemetery, and both are protected in this policy. The rooftops provide significant viewing spaces for the thousands of visitors who have been visiting Peckham in increasing numbers since 2008 for the leisure facilities in both of these buildings which are at the heart of the growing

In Southwark, our London Panorama and two Linear views all focus on St Paul's Cathedral as the Strategically Important Landmark. P19: Borough Views, View 5 - One Tree Hill ensures that the ability to recognise and appreciate St Paul's Cathedral within the wider panorama is preserved and enhanced. The Landmark Viewing Corridor and Wider Setting Consultation Areas from this view, of which development must not exceed a specified threshold, protects a viewing corridor over the view from the Bussey Building

cultural economy in Peckham.

The NSP recognises the importance of the rooftop view from the Bussey Building in the Design and accessibility guidance for the Aylesham centre site NSP 75: “Development massing ... should minimise impact on the view to the City from the Bussey Building rooftop.”

The view from the Peckham Multi Storey building also needs to be protected. At the time of the consultation on the Preferred Options the NSP allocated the Peckham Multi Storey site and building for redevelopment. Since then the Council has removed the site from the NSP and offered 15 year extensions to the leases for the operators in the building, taking its life until at least 2038 which is beyond the life of the NSP.

The Peckham Multi Storey is a Council owned building and so is publically accessible. The Bussey Building is privately owned but the PNAAP4 designation is that the building is identified as heritage value and should continue to be used for creative and cultural enterprises. This means the rooftop is also publically accessible.

Policy P14 2.11 provides a planning precedent for this kind of requirement when it requires private buildings to deliver publically accessible space at the top of buildings. This view is of such importance to Peckham social infrastructure and local economy that it needs protection in this policy.

Proposed changes to make the NSP sound

This Peckham town centre rooftop view should be added as a protected view in P19.

Organisation: Firmdale Holdings  
NSPPSV59.5

Whilst the redevelopment of the former car pound site is to be predominately guided by the emerging Old Kent Road Area Policy Action Plan, it is a significant concern that

to the city. The view from the Bussey Building is given further protection in the site allocation NSP75, which states that development massing should minimise the impact on the view to the City from the Bussey Building rooftop. A further 20m height restriction is also placed on development proposals to conform to the guidance set out in the Peckham and Nunhead Area Action Plan.

The Bussey Building is set within the Rye Lane Conservation Area. P17 Conservation Areas states that development relating to conservation areas will only be granted where the development conserves and enhances the significance of a conservation area’s setting, including views to and from the conservation area.

Objection noted. The NSP has been positively prepared with a robust evidence base to ensure that policies and design guidance is

the redevelopment potential of the site is compromised by the proposed ‘Borough View’ from Nunhead Cemetery to St Pauls Cathedral under draft Policy P19.

The views of St Pauls from Nunhead Cemetery have little historical significance and the cemetery has very low numbers of visitors. The specific viewpoint identified (which has already been compromised by Guy’s Cancer Centre following its completion in 2016) also has no spatial significance (as the location is not at the highest point of the cemetery and St Paul’s is visible only through carefully trimmed foliage, from a bench along one of the Cemetery paths).

Objection has previously been raised in representations to the New Southwark Plan Preferred Option – New and Amended Policies that Southwark’s Development Plan policies should not be applied to secure the protection of long-distance views to points of interest outside of the Borough boundaries, given the Mayor of London’s London View Management Framework (LVMF) (2012) provides protection of important cross-boundary views within the city.

The potential impact of formally protecting this largely unseen view under draft Policy under draft Policy P19 of the NSP PSV, with an apparently arbitrary identified viewpoint on the delivery of redevelopment across Southwark, in particular within the Old Kent Road Opportunity Area, is huge.

Allowing the ‘linear view of St Pauls Cathedral from Nunhead Cemetery’ to protect views of the dome and peristyle to St Paul’s Cathedral (as is proposed by the identification of the defining point to set the viewing plane threshold height of 52.1m AOD) would place a limit on height of development of 14-15 storeys, which would be likely to affect circa 16.3 hectares of the Old Kent Road Opportunity Area - of which 7.5 hectares (including the Former Car Pound on Mandela Way) is identified for redevelopment. This would be likely to compromise the delivery of housing on affected these sites and thus compromise the regeneration of the Opportunity Area as a consequence.

In proposing to protect “Borough views”, it is also unclear why the landmark viewing corridor from Nunhead Cemetery sets the defining point at St Paul’s Cathedral at 52.1m

sound, and ensuring compliance with the NPPF & London Plan. P19: Borough Views, P14: Tall Buildings, and ANNEX 4: Borough Views, and the London View Management Framework will ensure tall buildings are appropriate and maintain London’s strategic views and Borough views.

AOD to protect views of both the dome and peristyle to St Paul's Cathedral, when the landmark viewing corridor for the (much closer) view from Camberwell Road (across the Elephant and Castle Opportunity Area) is set some 6m higher (at 58.1m AOD) to protect views of the dome, but not the peristyle. This differentiation is made all the more unclear by the description of the view from Camberwell Road at Annex 4 of the NSP PSV, which identifies "The Cathedral's dome and peristyle are clearly visible above the existing middle ground townscape and create a distinctive silhouette with clear sky on both sides."

Significant concern is expressed as to the specific viewpoint is somewhat arbitrary, with the potential for views of St Paul's from several other locations within Nunhead Cemetery to be enhanced in a similar manner by managing the cutting of grass and pruning of trees, especially given the imposition of special protection for this view will significantly restrict the height of development that can be achieved within the Old Kent Road Opportunity Area.

Draft Policy P19 is considered to be unsound on the basis that there is not a robust and credible evidence base to for the protection of the proposed 'linear view of St Pauls Cathedral from Nunhead Cemetery' to be adequately 'justified'. In its current form the protection of the view from Nunhead Cemetery to St Paul's Cathedral will have significant impact on the ability to realise the vision for the Old Kent Road Opportunity Area to create a new Central London community with 10,000 new jobs and 20,000 new homes. As simply picking a slightly different viewpoint for protection could have significantly less impact on development potential of site across the borough, serious doubt is raised to whether draft Policy P19's proposed protection of the 'linear view of St Pauls Cathedral from Nunhead Cemetery' in its current form represents the most appropriate strategy, when considered against reasonable alternatives.

Change sought – If an existing view of St Paul's Cathedral from Nunhead Cemetery is to be sought under Policy P19, then alternative viewpoint locations must be considered, informed by a recognition that the existing viewpoint is arbitrary and artificially maintained, together with an understanding that slight change in location could have a significantly reduced impact on development potential on site across the borough, in

particular within the Old Kent Road Opportunity Area.

Organisation: GLA  
NSPPSV66

The area the draft NSP covers falls within the background of a number of Protected Vistas as illustrated in the image below which shows part of Southwark.

The Mayor wrote to every London local planning authority in March 2017 asking them to consult the Mayor where buildings were proposed that fell within the background of a Protected Vista even where the site was beyond the area currently designated as a wider consultation area in the Mayor's 2012 London Views Management Framework Supplementary Planning Guidance.

Local Plans, and any relevant AAPs, OAPFs and masterplans should be in line with London Plan Policy

7.12 C which states that:

'Development proposals in the background of a view should give context to the landmarks and not harm the composition of the view as a whole.'

Development proposals should carefully assess any impacts the development may have on Protected Vistas to ensure no harm would result to their composition.

The London Views Management Framework Supplementary Planning Guidance 2012 (LVMF SPG) provides detailed guidance on each of the management plans for assessing development in the background of a strategic view. In addition, paragraphs 63, 67, and 77-79 provide an overview of how development should be managed in the background of different types of strategic views and can be downloaded from this webpage: <https://london.gov.uk/what-we-do/planning/implementinglondon-plan/supplementary-planning-guidance/london-view-management>.

The background to these strategic views includes areas covered by the Old Kent

Changes to borough views were made as part of the amended policies consultation in accordance with the advice issues by the GLA.

Road Opportunity Area. The location identified as suitable for tall buildings in the Local Plan and area strategies must consider the location of the background area of the strategic views as well as the area covered by Southwark's local views. Policy and planning guidance in respect of appropriate building heights for locations must not adversely impact on local or strategic views in accordance with London Plan Policy 7.7-part A, D. b and E. Further information on the geography of the background areas can be found here: <https://data.london.gov.uk/dataset/london-views-management-framework-lvmf-extendedbackground-vistas>.

In the consultation document titled - New Southwark Plan - Annex 4. Borough Views, covers the location and management for the Borough's local views. The Mayor welcomes the clear identification of the Borough's local views and application of the LVMF principles in accordance with London Plan Policy 7.12-part J. Further refinement of the view coordinates could be undertaken to more closely apply the LVMF approach and my officers can provide advice in this regard if required. It is noted that Local views 1 and 2 have clear views of the main body of St Paul's Cathedral below the lower drum and the dome. The Borough should consider lowering the height of the threshold plane of the viewing corridor and consultation area for these views to help preserve these exceptional local views of one of London's most significant heritage assets in accordance with London Plan Policy 7.8-part F and G, which requires local polices to maintain and enhance and improve access to heritage assets and the contribution the asset make to London's cultural identity.

Individual  
NSPPSV101.2

The area the draft NSP covers falls within the background of a number of Protected Vistas as illustrated in the image below which shows part of Southwark.

Positive representation noted. The borough will lower the height of the threshold plane of the viewing corridor and consultation area to protect more of the entire length of St Paul's Cathedral's balustrade above the screen walls to the Nave and Chancel.

The Mayor wrote to every London local planning authority in March 2017 asking them to consult the Mayor where buildings were proposed that fell within the background of a Protected Vista even where the site was beyond the area currently designated as a wider consultation area in the Mayor's 2012 London Views Management Framework Supplementary Planning Guidance.

Local Plans, and any relevant AAPs, OAPFs and masterplans should be in line with London Plan Policy 7.12 C which states that:

'Development proposals in the background of a view should give context to the landmarks and not harm the composition of the view as a whole.'

Development proposals should carefully assess any impacts the development may have on Protected Vistas to ensure no harm would result to their composition.

The London Views Management Framework Supplementary Planning Guidance 2012 (LVMF SPG) provides detailed guidance on each of the management plans for assessing development in the background of a strategic view. In addition, paragraphs 63, 67, and 77-79 provide an overview of how development should be managed in the background of different types of strategic views and can be downloaded from this webpage: <https://london.gov.uk/what-we-do/planning/implementinglondon-plan/supplementary-planning-guidance/london-view-management>.

The background to these strategic views includes areas covered by the Old Kent Road Opportunity Area. The location identified as suitable for tall buildings in the Local Plan and area strategies must consider the location of the background area of the strategic views as well as the area covered by Southwark's local views. Policy and planning guidance in respect of appropriate building heights for locations must not adversely impact on local or strategic views in accordance with London Plan Policy 7.7-part A, D. b and E. Further information on the geography of the background areas can be found here: <https://data.london.gov.uk/dataset/london-views-management-framework-lvmf-extendedbackground-vistas>.

In the consultation document titled - New Southwark Plan - Annex 4. Borough Views, covers the location and management for the Borough's local views. The Mayor

welcomes the clear identification of the Borough's local views and application of the LVMF principles in accordance with London Plan Policy 7.12-part J. Further refinement of the view coordinates could be undertaken to more closely apply the LVMF approach and my officers can provide advice in this regard if required. It is noted that Local views 1 and 2 have clear views of the main body of St Paul's Cathedral below the lower drum and the dome. The Borough should consider lowering the height of the threshold plane of the viewing corridor and consultation area for these views to help preserve these exceptional local views of one of London's most significant heritage assets in accordance with London Plan Policy 7.8-part F and G, which requires local polices to maintain and enhance and improve access to heritage assets and the contribution the asset make to London's cultural identity.

Organisation: London School of Economics and Political Science (LSE)  
NSPPSV113.3

Representations by London School of Economics and Political Science on  
The draft New Southwark Plan: Regulation 19 Consultation

These representations have been prepared on behalf of The London School of Economics and Political Science (LSE) regarding the draft New Southwark Plan Proposed Submission Version (NSP) consultation.

LSE broadly supports the Council in its objectives to deliver new homes and jobs in the Borough. However to assist the Council in these objectives we set out a series of amendments aimed at ensuring the NSP is both legal and sound in order to promote good growth throughout the Borough.

Where suggestions are put forward these are designed to help guide the Council on the deliverability of the policies as well as their compliance with the London Plan and other strategic guidance. The Draft London Plan (DLP) was issued by the Mayor of London on 1st December 2017 and is subject to consultation up to the start of March 2018. Many of the key policies within the NSP reflect the wording of the Draft London Plan (DLP) 2017 which will maintain consistency across the policy framework. We have included references where appropriate to the DLP as well as the current adopted London Plan.

Noted. The policy as currently worded is considered sound. Annex 4 and P19 Borough views do not create a parallel set of strategic views, but are positively prepared and in conformity with the London Plan. The London Plan, Policy HC3 Strategic and Local Views, states that boroughs clearly identify local views in their Local Plans, which could take the form of geometrically defining the view. The NSP P19 states the local significance of these five 'borough views'. This policy will be amended to state that development must preserve and where possible enhance the borough views of significant landmarks and townscape, this is in line with the approach in the emerging London Plan. The draft New London Plan designates the Millennium Bridge and Thames side at Tate Modern as a Strategic View. The view from Millennium Bridge south towards the Tate Modern provides a unique townscape of one of London's landmark buildings. As such, the selection of View 5 is appropriate when acknowledging its prominence from the river and its significant contribution to the local townscape. The methodology and terminology used to identify and define our

LSE will be making representations on the Draft London Plan.

#### The London School of Economics and Political Science (LSE)

LSE ranks second on the world for social sciences (QS World University Rankings 2016-2017) and is classed as world leading for research. The School has a distinct student population, relative to its competitors, with a high proportion of one year Masters students, and a particularly international student body. There were 11,885 students in 2016-2017; 5082 undergraduates and 5,990 graduates. Over 8000 students were from overseas with a majority from non EU countries. The total number of students is set to increase and LSE's investment plans in its campus and student residences reflect its ambition to maintain its place and ranking as a world class university located at the heart of London.

Data shows that LSE postgraduate student demand for accommodation significantly surpasses supply. The School wishes to move to a position where it can guarantee an offer of accommodation to all new first year students. Currently LSE's guarantee is for first year undergraduate students only, while applications for appropriate accommodation from students with disabilities continue to be prioritised. On current projections on student numbers, this amounts to a required capacity of between 6,000 - 7,000 bed spaces in the next eight years. Bed space numbers total 4,669 in 2017/18.

The overarching objective of LSE's Student Bed Space Strategy (SBSS) is to continue to attract the brightest students from around the world and enhance the student experience through the provision of a competitive residential offer. This is underpinned by several evidence-based principles including: wishing to make guaranteed offers for all first-year students; having a significant proportion of economy priced bed spaces to meet the demand for affordable accommodation; a location model that meets student demand for sustainable and accessible accommodation; and increasing the number of LSE owned and managed bed spaces.

The unique selling point of LSE residences is that they are within walking distance to the School which is firmly established, and will remain, in the heart of London. LSE

Borough Views is consistent with the methodology used for the Mayor of London's adopted London Views Management Framework 2012. GLA's comment on the Proposed Submission Version of the NSP stated "The Mayor welcomes the clear identification of the Borough's local views and application of the LVMF principles in accordance with London Plan Policy 7.12-part J." An amendment will be made to correct the spelling of St Paul's.

therefore seeks growth in accommodation capacity in close proximity to the School campus. This location supports the business model of LSE's renowned Summer School and other student group lettings and also the commercial lettings outside of term time which allows for shorter student contracts and therefore a lower annual cost to students. LSE is keen to work in partnership with local authorities whose policies recognise the School's unique position and contribution.

#### Representations on behalf of the LSE

The principal area of concern for LSE is the impact the NSP will have on the opportunities to develop the LSE's property at Bankside House. Bankside House currently provides approximately 600 student beds in a converted office building behind Tate Modern. The LSE has a strategic plan to replace the current Bankside House with a substantially improved and larger facility which will cater for the strong demand for places at LSE. The importance of this site is the number of beds it provides and the close proximity to the main LSE campus at Aldwych which is a short walk away.

Please note where paragraph numbers are given, these have been counted down from the relevant section referenced.

#### Policy P19 – Borough Views (and Annex 4)

There is support for the objectives of the Policy however it is considered that the Council should reword the Policy to remove reference to 'positively enhance significant landmarks and townscape'. The borough has a diverse and complex townscape which these new views are being fitted into. The context of the views is often adjacent or within major regeneration areas such as the Elephant and Castle or Old Kent Road Opportunity Areas. The objectives of the frameworks for these areas are the delivery of new homes, new education facilities, new jobs etc. As such a balance has to be struck between the objectives of the policy related to regeneration and policy related to protecting views. Seeking to 'positively enhance views' suggests reducing or limiting

<p>development which will not have a significant effect on views, such as to the wider setting. Greater flexibility has to be applied to the policies to deliver this balance.</p>	
<p>Organisation: Miller Hare Limited NSPPSV121.1</p> <p>TEXT, ANALYSIS AND DIAGRAMS COULD NOT BE COPIED FROM .PDF FILE - PLEASE SEE ORIGINAL DOCUMENT</p>	<p>Representation noted.</p>
<p>Organisation: Port of London Authority NSPPSV143.5</p> <p>The PLA support the reference to river prospect views in the policy, and the need to ensure development takes these into account, which aligns with London Plan policy regarding strategic views.</p>	<p>Supportive representation acknowledged.</p>
<p>Individual NSPPSV151.13</p> <p>P19 As for other policies, the word ‘must’ should be removed. The draft policy should reference and reflect the advice that is set out in the London View Management Framework prepared by the Mayor of London. Delete the word ‘must’.</p>	<p>Objection noted. The NSP has been positively prepared with a robust evidence base to ensure that policies and design guidance is sound, and ensuring compliance with the NPPF &amp; London Plan. P19: Borough Views, P14: Tall Buildings, and ANNEX 4: Borough Views, and the London View Management Framework will ensure tall buildings are appropriate and maintain London’s strategic views and Borough views. The word ‘must’ is used to ensure that development maintains and where possible enhances these key strategic borough views.</p>
<p>Organisation: Royal Mail Pension Trustees Limited NSPPSV155.6</p> <p>Dear Sir/Madam, New Southwark Plan - Proposed Submission Version (December 2017) Representations on behalf of Royal Mail Pension Trustees Limited</p>	<p>Representation noted. In Southwark, our London Panorama and two Linear views all focus on St Paul’s Cathedral as the Strategically Important Landmark. The NSP has been positively</p>

We write on behalf of our client, Royal Mail Pension Trustees Limited, to submit representations to the New Southwark Plan - Proposed Submission Version – which are provided below.

Our client

Royal Mail Pension Trustees Limited are the freehold owners of the Bricklayers Arms Distribution Centre, Mandela Way which is proposed for allocation as part of 'Site OKR3: Mandela Way in the emerging Old Kent Road Area Action Plan ("AAP") for mixed use redevelopment to include employment (B use class), residential (C3 use class), primary school (D1 use class) development and a new park.

Representations

Policy P19: Borough views

Whilst the redevelopment of the Bricklayers Arms Distribution Centre is to be predominately guided by the emerging Old Kent Road Area Policy Action Plan, it is a significant concern that the redevelopment potential of the site is in part compromised by the proposed 'Borough View' from Nunhead Cemetery to St Pauls Cathedral under draft Policy P19.

The views of St Pauls from Nunhead Cemetery have little historical significance and the cemetery has very low numbers of visitors. The specific viewpoint identified (which has already been compromised by Guy's Cancer Centre following its completion in 2016) also has no spatial significance (as the location is not at the highest point of the cemetery and St Paul's is visible only through carefully trimmed foliage, from a bench along one of the Cemetery paths).

Objection has previously been raised in representations to the New Southwark Plan Preferred Option – New and Amended Policies that Southwark's Development Plan policies should not be applied to secure the protection of long-distance views to points of interest outside of the Borough boundaries, given the Mayor of London's London View Management Framework (LVMF) (2012) provides protection of important cross-boundary views within the city.

prepared with a robust evidence base to ensure that policies and design guidance is sound, and ensuring compliance with the NPPF & London Plan. P19: Borough Views, P14: Tall Buildings, and ANNEX 4: Borough Views, and the London View Management Framework will ensure tall buildings are appropriate and maintain London's strategic views and Borough views. The threshold height has been lowered to ensure protect more of the entire length of St Paul's Cathedral's balustrade above the screen walls to the Nave and Chancel.

The potential impact of formally protecting this largely unseen view under draft Policy under draft

Policy P19 of the NSP PSV, with an apparently arbitrary identified viewpoint on the delivery of redevelopment across Southwark, in particular within the Old Kent Road Opportunity Area, is huge.

Allowing the 'linear view of St Pauls Cathedral from Nunhead Cemetery' to protect views of the dome and peristyle to St Paul's Cathedral (as is proposed by the identification of the defining point to set the viewing plane threshold height of 52.1m AOD) would place a limit on height of development of 14-15 storeys, which would be likely to affect circa 16.3 hectares of the Old Kent Road Opportunity Area - of which 7.5 hectares (including the Bricklayers Arms Distribution Centre) is identified for redevelopment. This would be likely to compromise the delivery of housing on affected these sites and thus compromise the regeneration of the Opportunity Area as a consequence.

In proposing to protect "Borough views", it is also unclear why the landmark viewing corridor from Nunhead Cemetery sets the defining point at St Paul's Cathedral at 52.1m AOD to protect views of both the dome and peristyle to St Paul's Cathedral, when the landmark viewing corridor for the (much closer) view from Camberwell Road (across the Elephant and Castle Opportunity Area) is set some 6m higher (at 58.1m AOD) to protect views of the dome, but not the peristyle. This differentiation is made all the more unclear by the description of the view from Camberwell Road at Annex 4 of the NSP PSV, which identifies "The Cathedral's dome and peristyle are clearly visible above the existing middle ground townscape and create a distinctive silhouette with clear sky on both sides."

Significant concern is expressed as to the specific viewpoint is somewhat arbitrary, with the potential for views of St Paul's from several other locations within Nunhead Cemetery to be enhanced in a similar manner by managing the cutting of grass and pruning of trees, especially given the imposition of special protection for this view will significantly restrict the height of development that can be achieved within the Old Kent Road Opportunity Area.

Draft Policy P19 is considered to be unsound on the basis that there is not a robust and credible evidence base to for the protection of the proposed ‘linear view of St Pauls Cathedral from Nunhead Cemetery’ to be adequately ‘justified’. In its current form the protection of the view from Nunhead Cemetery to St Paul’s Cathedral will have significant impact on the ability to realise the vision for the Old Kent Road Opportunity Area to create a new Central London community with 10,000 new jobs and 20,000 new homes. As simply picking a slightly different viewpoint for protection could have significantly less impact on development potential of site across the borough, serious doubt is raised to whether draft Policy P19’s proposed protection of the ‘linear view of St Pauls Cathedral from Nunhead Cemetery’ in its current form represents the most appropriate strategy, when considered against reasonable alternatives.

Change sought – If an existing view of St Paul’s Cathedral from Nunhead Cemetery is to be sought under Policy P19, then alternative viewpoint locations must be considered, informed by a recognition that the existing viewpoint is arbitrary and artificially maintained, together with an understanding that slight change in location could have a significantly reduced impact on development potential on site across the borough, in particular within the Old Kent Road Opportunity Area.

Organisation: Strathclyde Regional Pension Fund  
NSPPSV174.6

Whilst the redevelopment of the Southernwood Retail Park is to be predominately guided by the emerging Old Kent Road Area Policy Action Plan, it is a significant concern that the redevelopment potential of the site is in part compromised by the proposed ‘Borough View’ from Nunhead Cemetery to St Pauls Cathedral under draft Policy P19. The views of St Pauls from Nunhead Cemetery have little historical significance and the cemetery has very low numbers of visitors. The specific viewpoint identified (which has already been compromised by Guy’s Cancer Centre following its completion in 2016) also has no spatial significance (as the location is not at the highest point of the cemetery and St Paul’s is visible only through carefully trimmed foliage, from a bench along one of the Cemetery paths).

Objection has previously been raised in representations to the New Southwark Plan

Representation noted. In Southwark, our London Panorama and two Linear views all focus on St Paul’s Cathedral as the Strategically Important Landmark. The NSP has been positively prepared with a robust evidence base to ensure that policies and design guidance is sound, and ensuring compliance with the NPPF & London Plan. P19: Borough Views, P14: Tall Buildings, and ANNEX 4: Borough Views, and the London View Management Framework will ensure tall buildings are appropriate and maintain London’s strategic views and Borough views. The threshold height has been lowered to ensure protect more of the entire length of St Paul’s Cathedral’s balustrade above the screen walls to the Nave and Chancel.

Preferred Option – New and Amended Policies that Southwark’s Development Plan policies should not be applied to secure the protection of long-distance views to points of interest outside of the Borough boundaries, given the Mayor of London’s London View Management Framework (LVMF) (2012) provides protection of important cross-boundary views within the city.

The potential impact of formally protecting this largely unseen view under draft Policy under draft Policy P19 of the NSP PSV, with an apparently arbitrary identified viewpoint on the delivery of redevelopment across Southwark, in particular within the Old Kent Road Opportunity Area, is huge.

Allowing the ‘linear view of St Pauls Cathedral from Nunhead Cemetery’ to protect views of the dome and peristyle to St Paul’s Cathedral (as is proposed by the identification of the defining point to set the viewing plane threshold height of 52.1m AOD) would place a limit on height of development of 14-15 storeys, which would be likely to affect circa 16.3 hectares of the Old Kent Road Opportunity Area - of which 7.5 hectares (including part of the Southernwood Retail Park site) is identified for redevelopment. This would be likely to compromise the delivery of housing on affected these sites and thus compromise the regeneration of the Opportunity Area as a consequence.

In proposing to protect “Borough views”, it is also unclear why the landmark viewing corridor from Nunhead Cemetery sets the defining point at St Paul’s Cathedral at 52.1m AOD to protect views of both the dome and peristyle to St Paul’s Cathedral, when the landmark viewing corridor for the (much closer) view from Camberwell Road (across the Elephant and Castle Opportunity Area) is set some 6m higher (at 58.1m AOD) to protect views of the dome, but not the peristyle. This differentiation is made all the more unclear by the description of the view from Camberwell Road at Annex 4 of the NSP PSV, which identifies “The Cathedral’s dome and peristyle are clearly visible above the existing middle ground townscape and create a distinctive silhouette with clear sky on both sides.”

Significant concern is expressed as to the specific viewpoint is somewhat arbitrary, with

the potential for views of St Paul's from several other locations within Nunhead Cemetery to be enhanced in a similar manner by managing the cutting of grass and pruning of trees, especially given the imposition of special protection for this view will significantly restrict the height of development that can be achieved within the Old Kent Road Opportunity Area.

Draft Policy P19 is considered to be unsound on the basis that there is not a robust and credible evidence base to for the protection of the proposed 'linear view of St Pauls Cathedral from Nunhead Cemetery' to be adequately 'justified'. In its current form the protection of the view from Nunhead Cemetery to St Paul's Cathedral will have significant impact on the ability to realise the vision for the Old Kent Road Opportunity Area to create a new Central London community with 10,000 new jobs and 20,000 new homes. As simply picking a slightly different viewpoint for protection could have significantly less impact on development potential of site across the borough, serious doubt is raised to whether draft Policy P19's proposed protection of the 'linear view of St Pauls Cathedral from Nunhead Cemetery' in its current form represents the most appropriate strategy, when considered against reasonable alternatives.

Change sought – If an existing view of St Paul's Cathedral from Nunhead Cemetery is to be sought under Policy P19, then alternative viewpoint locations must be considered, informed by a recognition that the existing viewpoint is arbitrary and artificially maintained, together with an understanding that slight change in location could have a significantly reduced impact on development potential on site across the borough, in particular within the Old Kent Road Opportunity Area.

Organisation: Team London Bridge  
NSPPSV179.7

20. We commend the positive approach to the importance of Southwark's historic environment and key views in the suite of Policies P16, 17, 18, 19, 20 and 21. We also support recognition of the importance of "placemarks" in the London Bridge Area Vision.

21. Team London Bridge is working with Shad Thames Area Management Partnership

Support noted. In Southwark, our London Panorama and two Linear views all focus on St Paul's Cathedral as the Strategically Important Landmark. The policy doesn't focus on important 'placemarks'. P18: Conservation areas protects local character and heritage assets in Conservation areas. The NSP has been positively

and Bermondsey Street Area Partnership to identify valued views and other placemarks that shape the character of our areas. This includes an online mapping survey in which people are identifying the Placemarks (<https://placemarks.commonplace.is/>) that matter to them. This review has shown that people value not only views but also important buildings, open spaces, trees, public art, street furniture, rights of way, signs, names and many other things that contribute to local character. A majority of these are not recognised in planning or heritage policy or legislation.

22. We believe the value of placemarks as recognised in the London Bridge Area Vision needs to be delivered through the inclusion of placemarks in the list of assets acknowledged in Policy P18, a strengthening of Policy P19 and preparation of a Supplementary Planning Document to provide clarity on the purpose and role of placemarks.

#### Recommendations

- Amend Policy P18 to include “placemarks” in the list of assets in section 1.1
- Amend Policy P19 to include views of “placemarks” alongside “significant landmarks and townscape” as being views that must be enhanced by development
- Support preparation of a Supplementary Planning Document on placemarks

prepared with a robust evidence base to ensure that policies and design guidance is sound, and ensuring compliance with the NPPF & London Plan. P19: Borough Views, P14: Tall Buildings, and ANNEX 4: Borough Views, and the London View Management Framework will ensure tall buildings are appropriate and maintain London’s strategic views and Borough views. The threshold height has been lowered to ensure protect more of the entire length of St Paul’s Cathedral’s balustrade above the screen walls to the Nave and Chancel.

Organisation: Tiger Developments Ltd  
NSPPSV191.3

Notwithstanding our comments above of the cross referral of Policy P19 within Site Allocation NSP75, the following change is strongly encouraged. The policy requires that all relevant development:

“must ... positively enhance the Borough views of significant landmarks and townscape”.

For the policy to be effective, it is encouraged the use of the phrase “maintain or” should be included to Sub-section 1 before “positively enhance” to add an appropriate degree of flexibility. It will not always be possible for relevant developments that appear within these long distance views to positively enhance existing views, and therefore the modification would allow for at least the preservation of these important aspects.

The tests of long distance views that follow the Policy appear to provide for this

This policy will be amended to state that development must preserve and where possible enhance the borough views of significant landmarks and townscape, this is in line with the approach in the emerging London Plan.

flexibility (for example 2.1 – “maintain” and 2.2 “not compromise”).

Individual  
NSPPSV211.2

This policy is not positively prepared because it does not include protection for the London panorama from the rooftops of the Peckham Multi Storey building and the Bussey Building in Peckham town centre.

This view is similar to that from One Tree Hill and Nunhead Cemetery, and both are protected in this policy. The rooftops provide significant viewing spaces for the thousands of visitors who have been visiting in increasing numbers Peckham since 2008 for the leisure facilities in both of these buildings which are at the heart of the growing cultural economy in Peckham.

The NSP recognises the importance of the rooftop view from the Bussey Building in the Design and accessibility guidance for the Aylesham centre site NSP 75: “Development massing ... should minimise impact on the view to the City from the Bussey Building rooftop.”

The view from the Peckham Multi Storey building also needs to be protected. At the time of the consultation on the Preferred Options the NSP allocated the Peckham Multi Storey site and building for redevelopment. Since then the Council has removed the site from the NSP and offered 15 year extensions to the leases for the operators in the building, taking its life until at least 2038 which is beyond the life of the NSP.

The Peckham Multi Storey is a Council owned building and so is publically accessible. The Bussey Building is privately owned but the PNAAP4 designation is that the building is identified as heritage value and should continue to be used for creative and cultural enterprises. This means the rooftop is also publically accessible.

Policy P14 2.11 provides a planning precedent for this kind of requirement when it requires private buildings to deliver publically accessible space at the top of buildings. This view is of such importance to Peckham social infrastructure and local economy that it needs protection in this policy.

In Southwark, our London Panorama and two Linear views all focus on St Paul’s Cathedral as the Strategically Important Landmark. P19: Borough Views, View 5 - One Tree Hill ensures that the ability to recognise and appreciate St Paul’s Cathedral within the wider panorama is preserved and enhanced. The Landmark Viewing Corridor and Wider Setting Consultation Areas from this view, of which development must not exceed a specified threshold, protects a viewing corridor over the view from the Bussey Building to the city. The view from the Bussey Building is given further protection in the site allocation NSP75, which states that development massing should minimise the impact on the view to the City from the Bussey Building rooftop. A further 20m height restriction is also placed on development proposals to conform to the guidance set out in the Peckham and Nunhead Area Action Plan.

The Bussey Building is set within the Rye Lane Conservation Area. P17 Conservation Areas states that development relating to conservation areas will only be granted where the development conserves and enhances the significance of a conservation area’s setting, including views to and from the conservation area.

Proposed changes to make the NSP sound

This Peckham town centre rooftop view should be added as a protected view in P19.

Individual  
NSPPSV239.16

While P19 provides some clarity on the key views, there are other views that have failed to be incorporated especially views of Southwark Cathedral. Although the fact box describes the types of protected views, there is clearly more work to be done on this to ensure that the policy is sound. Often it is only when view is lost that people take regard to the significance of having robust policy in place. We would like to see more emphasis placed on producing a supplementary planning document of protected views similar to that produced by the City of London so that there is a clearer understanding of impact for developers.

We would particularly draw your attention to the following section 3 from the City's SPD - Qualitative View Protection – River Prospects

3.3 Other designated strategic views have precisely defined assessment points but are protected by qualitative assessment of the impact of a proposal on the important elements of the view. For the City, most of the relevant views are 'River Prospects' from Thames bridges and the riverside walk.

3.4 The management of River Prospects should ensure that the juxtaposition between elements, including the river frontage and landmarks, is appreciated within a wider London context. Development must ensure that key features of the view can continue to be enjoyed in the context of their surrounding environment, including distant buildings.

3.5 Development in the foreground and middle ground of the River Prospects should enhance the juxtaposition of townscape elements with the riverbanks and the depth and variety of the surrounding London townscape. Interventions into the built fabric

Borough views are significant views and panoramas that make a positive contribution to experiencing Southwark's environment within London, informing how we are located in an historic and important world city. Southwark Cathedral is a Grade I listed building and is set within the Borough High Street Conservation Area. P17 Conservation Areas states that development relating to conservation areas will only be granted where the development conserves and enhances the significance of a conservation area's setting, including views to and from the conservation area.

The NSP has been prepared to ensure that policies and design guidance is sound, and ensuring conformity with the NPPF & London Plan. P19: Borough Views, alongside P14: Tall Buildings, Annex 4: Borough Views, and the London View Management Framework will ensure that development is appropriate and maintains Southwark's Borough views.

Annex 4: Borough Views has been updated so that the proposed view geometry is consistent with the approach taken in the London View Management Framework, this Annex provides further information on each of our Borough Views. In particular, a defined assessment point, Landmark Viewing Corridors and Wider Setting Consultation Areas; the coordinates for each piece of geometry are set out in this Annex. The annex also provides a qualitative assessment of each Borough View. This policy will be updated to refer to Annex 4 - Borough Views.

should preserve or, where possible, enhance this relationship. Development in the foreground or middle ground that is overly intrusive, unsightly or prominent to the detriment of the view as a whole should be refused.

3.6 Some River Prospects include views of the Tower of London World Heritage Site. New development in the background of a River Prospect should, where relevant, preserve or enhance a viewer's ability to appreciate the Outstanding Universal Value of a World Heritage Site and should be consistent with the objectives of the World Heritage Site Management Plan.

#### P21: World heritage sites

Organisation: Historic England  
NSPPSV83.9

While we welcome the inclusion of references the three world heritage sites within policy P21, we continue to believe that further detail is required here as to the Statement of Outstanding Universal Value (OUV) for each of the three. This would clarify how development may have the potential for negative impacts on the OUV of a site. At the very least, the Plan should make clear that development must consider the relevant issues and how the relevant OUV is to be managed. We recommend adding a final sentence

'Any proposals likely to have an impact on Outstanding Universal Value must demonstrate they have had regard to the relevant management plan of the World Heritage Site concerned'.

Organisation: Dulwich Society  
NSPPSV119.5

I write as a member of the Dulwich Society. My comments relate to the Development Management Policies covering aspects of the historic environment.

Representation acknowledged. The policy will be amended to provide further clarity on how development is expected to respond to the relevant Statements of Outstanding Universal Value.

Representation has been acknowledged and feedback from this round of consultation will help with revisions to the NSP to ensure that guidance is sound and complies with the NPPF & London Plan.

At the outset, I am bound to suggest that the Plan is basically unsound because it fails to take on the emerging policies and proposals contained in the Draft London Plan. This is a matter of timing, and in no sense represents an error of judgement on the part of Southwark. Ideally therefore, we suggest that the Plan be withdrawn pending the outcome of the EIP into the London Plan. Failure to do so, will mean that the Plan will subsequently require substantial amendment, because the approach adopted in the new London Plan differs markedly from that of its predecessor.

The Society's comments on the Development Management policies are as follows:

#### P21 World Heritage Sites

This has been an area that has attracted much criticism from UNESCO, Historic England's predecessor English Heritage, ICOMOS and others. Objections have been overruled, and a series of perverse decisions have been waved through the planning system, contrary to the policies in the current London Plan, and in the case of the Palace of Westminster and Westminster Abbey World Heritage Site, contrary to Southwark's own policies. Accordingly, relevant policies are being tightened and extended as part of the review of the London Plan, and these will then have to be carried forward into Borough Plans.

This policy will be prepared to ensure Outstanding Universal Value of World Heritage Sites and their settings are sustained and enhanced.

## Representation

### P22: River Thames

Organisation: Bankside Residents Forum  
NSPPSV19.17

We are all only custodians of the river! Given recent campaigns regarding the Garden Bridge proposal and the strong local opposition to extending development or buildings over the river there is a need to revisit this policy to ensure it is positively prepared which it isn't at the moment.

Although this is unlikely we would like to see the river designated as an Ancient Schedule Monument or Grade 1 listed for the following reasons provided by experts on the Thames.

The relationship between the people living on the south bank of the Thames in the City reaches and the river itself is very strong, and can be seen over the past 10,000yrs in one form or another. The environmental excavation undertaken during the TfL Jubilee line extension project has shown that during the Mesolithic period the path of the main Thames channel ran south of the current position in this area (Sidell J., Wilkinson K., Scaife R. & Cameron N. 2000 The Holocene Evolution of the London Thames. London, MoLAS Monograph 5).

However, a series of eyots along the current south side of the river have shown

Representation has been acknowledged and feedback from this round of consultation will help with revisions to the NSP to ensure that guidance is sound and complies with the NPPF & London Plan.

evidence of human presence in this period at sites in Hopton St and Guy's Hospital (Bates & Whittaker 2004 66-70). There has also been a number of Thames picks recovered from the foreshore at Winchester Wharf (between London and Cannon St bridges).

In the Neolithic period, it is likely that the current main channel was beginning to be delineated and forestation established. Mixed woodland on the foreshore at Winchester Wharf has been dated to the early Neolithic period and a number of flint tools have been recovered from both zones. Hopton St and Guy's Hospital again produced evidence of sites on eyot edges adjacent to streams of flints, pottery, ard marks, post- and stake-holes. The ard marks indicate the use of the eyots for agriculture, utilising the nutrient-rich silts from the river. Possible structures in the peat beds at Winchester Wharf suggest the use of trackways along what is now the foreshore from this period and a cut piece of timber found in the peat bed in the same location show the populace utilising resources adjacent to the river channel.

In the Bronze Age, agriculture was even more evident with a series of sites exhibiting ard marks on eyots from Blackfriars Bridge down to London Bridge and beyond. Other Bronze Age evidence suggests the use of the possible salt marsh for cattle in the area near to Hopton St in the form of trackways or bridge-type structures. On the foreshore near Blackfriars Bridge a piece of LBA pottery was recovered very recently (identified by Lynn Blackmoor, MOLA) which maybe the beginning of further evidence as yet buried.

During the Roman period, the link with the river was even stronger. Ivor Noel Hume drew a plan of finds from the foreshore between London and Cannon St bridges, showing a large amount of Roman material (including 'mosaic pavements') on the foreshore. Two other items strengthen this tie – an intaglio found on the foreshore at Winchester Wharf with a rare depiction of a vessel with rowers (possibly an indicator of the presence of the Classis Britannica here in the Thames estuary) and also the footings of a jetty, dated to the Roman period near to St Mary Overie dock. This latter is probably the only waterfront structure from this period still with its toes in the Thames.

Clearly in the Anglo-Saxon and Norman periods, the use of the river for its resources

was paramount (a possible fishtrap, now eroded, from this period has been recorded at FSW11). In the Medieval period, there were many stairs creating an easy access to the water along the river frontage, the remains of which may be found at Winchester Wharf. Pottery on the foreshore from all periods have linked the area to the Thames – a tin-glazed ware kiln can be found at Southwark Cathedral and saggars from there at FSW11.

In spite of the dominant City and Corporation on the northern bank, Bankside and its vibrant community have always been tied into the Thames.

Organisation: Environment Agency  
NSPPSV58.2

The policy is well-written with clear recommendations for new developments adjacent to the Thames Tidal Flood Defences. However, we would wish to see the policy aligning the Thames Estuary 2100 Plan (TE2100 Plan). It sets out the strategic direction for managing flood risk across the Estuary, and contains recommendations on what actions we and others will need to take in the short term (next 25 years), medium term (the following 15 years) and long term (to the end of the century). The Plan is based on current climate change guidance, but is adaptable to changes in predictions for sea level rise and climate change over the century.

We support the recommendation in paragraph 1.7, requiring all developments adjacent to defences and culverts to demonstrate that the integrity of the assets will not be compromised and to maintain and improve the Thames Tidal Flood Defences. We would like to see a recommendation that any works within the bylaw distance for a main river (8m for a fluvial river and 16m for a tidal river) may require a Flood Risk Activity Permit (FRAP). For more information on the FRAP process see the link below: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>

The local plan should reflect the TE2100 Plan riverside strategy concept and promote an integrated approach to riverside development that takes full account of future flood risk requirements and opportunities to provide wider environmental enhancements.  
New

Support noted. This policy will be reviewed to ensure it works to support the Thames Estuary 2100 Plan. However, it is important to recognise that the NSP is a strategic policy document which aims to set guidance on major development for new homes, social, green and transport infrastructure

developments along the River Thames should incorporate biodiversity enhancements in line with National and London-wide planning policy. Where there is no conflict with archaeological or heritage, river walls that require rebuilding should consider ecological enhancements that provide benefits for the inter-tidal zone.

Organisation: LB Lewisham  
NSPPSV106.5

I set out below officer level comments from the London Borough of Lewisham:

In relation to working with neighbours:

1 We acknowledge that through the South East London Duty to Cooperate group we have been working together under the duty, have entered into dialogue on a range of sub-regional and strategic cross boundary issues over a number of years and throughout the preparation of your Plan. We welcome the specific references given to this group and its outputs (e.g. 2014 South East London SHMA) in paragraphs 2.8, 2.9, 2.11 and 3.14 of your Duty to Cooperate Statement.

2 We welcome how your Plan acknowledges connectivity with your surrounding neighbours, especially in policies:

- IP1 Infrastructure – by mentioning working with neighbouring boroughs.
- P22 River Thames – by mentioning that development will relate to its neighbours, taking into account how the river meanders and the impact this can have on how buildings may be seen together.
- P48 Walking – by enhancing the borough’s walking networks by providing footways, routes and public realm that enable access through development site and adjoining areas and by enhancing strategic networks such as the Green Chain walking route, and supporting new and existing green links across the borough and sub-regionally.
- P49 Low line routes (figure 4) – by recognising the low line routes in close proximity to the borough boundary with Lewisham.
- AV.05 Crystal Palace and Gypsy Hill Area Vision – by being mindful of cross boundary issues.

Support noted.

Organisation: Port of London Authority  
NSPPSV143.6

## 6. Policy P22: River Thames

a. In principle the PLA supports the provision of a specific policy on the River Thames, which seeks to maintain and enhance the strategic importance and unique character of the River Thames – a number of detailed comments related to this policy are set out below:

b. The PLA supports the reference in point 1.1 that development must establish or continue the River Thames Path along the water frontage.

c. In regards to point 1.2, and the reference to creating new access points to the River Thames, the PLA in general supports the protection and enhancement of existing access points alongside waterways (including paths) but objects to the creation of new access points (including slipways and historic steps). There is strictly no right of public access to the foreshore except for navigation (getting in and out of boats) and for fishing and digging of bait. The PLA acknowledge that people access the foreshore but this is tolerated more than encouraged. In general the PLA is concerned about additional access to the foreshore for the following reasons:

1. Public safety – the foreshore is dangerous due to tides, soft mud, slip hazards, sharp objects, Weil's disease etc. The public are largely unaware of the tidal nature of the River Thames and the significant dangers that this poses. Every year, the Police, Fire Brigade, RNLI (via the Coastguard) and the PLA have to rescue people who are trapped in the mud.

2. Environmental – some of the foreshore provides important habitat for wildlife.

3. Archaeological – there are items and areas of the foreshore which are of archaeological interest. Anyone wishing to search the foreshore in any way needs a permit from the PLA. The permit is required for searching, metal detecting, digging, scraping etc. The PLA does not wish to encourage unlicensed access to the foreshore.

Support Noted.

d. The PLA broadly support point 1.3, regarding maintaining and enhancing the existing facilities that support and increase the use and enjoyment of the river and the associate list of facilities, which includes the following:

- i. Access points to and alongside the river, including stairs, piers and the Thames Path
- ii. Docks, including protection against partial or complete infilling
- iii. Mooring facilities (The PLA consider that this must be expanded to refer to residential, commercial and visitor moorings)
- iv. Facilities for passenger, freight and tourist traffic
- v. Sport and leisure facilities
- vi. Heritage assets on the foreshore and within the river

For some of the facilities mentioned above, specifically mooring facilities, facilities for passenger, freight and tourist traffic and sports and leisure facilities, consideration must be given to the provision of new facilities as well as just protecting and enhancing existing infrastructure.

e. Regarding point 1.5 and the provision of landmarks along the river, whilst the PLA in principle do not object to the provision of landmarks adjacent, or near to the riverside, it must be made clear that such landmarks should not be provided / installed on the foreshore or riverbed, and there should be no harm caused to the cohesiveness of the water's edge. The PLA must be consulted on any proposals regarding the future provision of landmarks along riverside area. For information, anything in, on or over the river up to mean high water will require a River Works License from the PLA.

f. Point 1.8 of the policy, regarding the statement that developments must avoid unacceptable harm or impacts on navigation, biodiversity, heritage assets or the existing character of the Thames Policy Area if proposing new mooring facilities must be expanded to include any type of development, not just mooring facilities.

g. The PLA welcomes and supports parts 1.4, 1.6, 1.7 and 1.9 of the proposed policy, in terms of additions to the policy the PLA request that reference must be made to the

<p>provision of Riparian life-saving equipment (such as grab-chains, access ladders and life buoys) along the riverside to a standard recommended in the 1991 Hayes Report on the Inquiry into River Safety. Suicide prevention measures should also be a consideration for any development adjacent to waterside areas.</p>	
<p>Organisation: Team London Bridge NSPPSV179.5</p> <p>18. The River Thames is a defining feature of north Southwark, including the eponymous London Bridge area which is named after the oldest river crossing. The London Bridge Plan emphasises the importance of the connections along the river and promotes the Thames Esplanade to “seamlessly connect London Bridge’s riverfront and Pier into Bankside to the west and the rest of The Queen’s Walk to Tower Bridge to the east, creating a riverwalk connection that will form a continuous path along the Thames.”</p> <p>19. The submitted Plan addresses the Thames through a Thames Policy Area defined in Policy P22 and through protection of the view of the river prospect in Policy P19. While there is recognition of the need for improved access points Policy P22 does not address the importance of improving the walkway along the river. This is a major omission given the known pinch points and locations where access along the river front is not currently possible.</p> <p>Recommendation</p> <ul style="list-style-type: none"> <li>• Strengthen Policy P22 to support the Thames Esplanade and improved access along the river front</li> </ul>	<p>Representation noted. The policy states that development within the Thames Policy Area must "maintain and enhance the existing facilities that support and increase the use and enjoyment of the river and the activities associated with the Thames in the Thames Policy Area, including:</p> <p>i. Access points to and alongside the river, including stairs, piers and the Thames Path". Nevertheless, the policy will be strengthened to ensure that movement along the riverbank is maintained and enhanced.</p>
<p>Organisation: Tom Pavitt on behalf of Marine Management Organisation NSPPSV289.1</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: - Do you consider that the New Southwark Plan is unsound because it is not: - Consistent with national policy and the London Plan.</p>	<p>Representation noted. The policy will be amended to ensure that guidance is sound and that it complies with the NPPF and the London Plan. In particular, the need to collaborate to identify relevant strategic matters which need to address in plans.</p>

Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.

To ensure the Southwark proposed submission for the local plan is sound the MMO recommends an inclusion of marine planning in line with the NPPF and Marine and Coastal Access Act.

"NPPF. 105. In coastal areas, local planning authorities should take account of the UK Marine Policy Statement and marine plans and apply Integrated Coastal Zone Management across local authority and land/sea boundaries, ensuring integration of the terrestrial and marine planning regimes.

179. In marine areas, local planning authorities should collaborate with the Marine Management Organisation to ensure that policies across the land/sea boundary are integrated."

Also the PAS soundness self-assessment checklist includes to "take account of marine planning".

With Southwark on the tidal Thames there is a direct overlap between marine planning and terrestrial planning in that the marine planning remit is up to the mean high water spring tides mark (we can supply a GIS layer of the spatial extent for any policy maps). An example of how Southwark could reference the Marine plans and the Marine policy statement in the absence of a South East Marine Plan in a section such as P22:River Thames is given below.

Southwark on the tidal Thames is within the South East Inshore Marine Plan area and a marine plan for this area will be prepared at a future date. Until a Marine Plan has been prepared, any relevant proposals that includes a section of the Tidal Thames should take account of the UK Marine Policy Statement.

MMO formal response-  
"Response to your consultation

The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.

#### Marine Licensing

Activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.

#### Marine Planning

As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas.

The MMO is currently in the process of developing marine plans for the remaining 7 marine plan areas by 2021.

Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or

tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist. "

Do you consider that the New Southwark Plan is unsound because it is not: - Please set out what change(s) you consider necessary to make the New Southwark Plan legally compliant or sound. You will need to say why this change will make the New Southwark Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

As above. I have emailed some examples of how marine planning and the MPS can be included in the absence of a South East Marine Plan but repeat here one suggested inclusion under the supportive text or 'reasons' for P22:River Thames or where Southwark sees relevant.

Southwark on the tidal Thames is within the South East Inshore Marine Plan area and a marine plan for this area will be prepared at a future date. Until a Marine Plan has been prepared, any relevant proposals that includes a section of the Tidal Thames should take account of the UK Marine Policy Statement.