

Representation	Officer Response
<p data-bbox="188 317 631 347">NSP51: London Bridge Health Cluster</p> <p data-bbox="188 357 353 421">Individual NSPPSV40.20</p> <p data-bbox="188 466 1088 564">The proposals for redevelopment of the following sites are not justified because the views of the local residents have not been fully considered and taken into account. I can expand on this at the oral examination.</p>	<p data-bbox="1140 466 2051 708">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. Southwark Council's SCI is currently in the process of being updated and any form of feedback received has been acknowledged and responded to, with all responses being uploaded online.</p>
<p data-bbox="188 719 719 783">Organisation: Guy's and St Thomas' Charity NSPPSV76.1</p> <p data-bbox="188 828 1016 895">Thank you for giving us the opportunity to comment on the proposed submission Local Plan (Regulation 19).</p> <p data-bbox="188 935 1079 1002">We write on behalf of Guy's and St Thomas' Charity, who are an interested land owner and investor into the London Borough of Southwark..</p> <p data-bbox="188 1042 1099 1109">These representations relate to the proposed site allocation 'NSP51: London Bridge Health Cluster in the proposed plan.</p> <p data-bbox="188 1149 1106 1289">At a national level, the NPPF supports a presumption in favour of sustainable development, and it is noted that local plans are prepared positively and are instructed to not be onerous or place restrictive requirements that could stifle investment and regeneration opportunities.</p> <p data-bbox="188 1329 1106 1428">It is our view that the London Borough of Southwark (LBS) is uniquely placed in London to act as a focus for growth and any new local plan must recognise and reflect this in its ambition. We are pleased to note that this sentiment is</p>	<p data-bbox="1140 828 1411 858">Representation noted.</p> <p data-bbox="1140 898 2063 1074">As this site is located within the CAZ, it is better suited to maintain the health provision, employment and educational floorspace than provision of conventional housing. This is a health cluster of considerable significance and it is not appropriate to erode this with conventional housing. Student housing has been allowed if it is linked to the health provision.</p> <p data-bbox="1140 1114 1986 1181">The addition of B1 offices that are ancillary to the health cluster will be added to the site allocation.</p> <p data-bbox="1140 1220 2063 1251">Student housing has been added as a possibility where this is for the hospital.</p> <p data-bbox="1140 1291 2040 1431">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</p>

captured in the emerging Local Plan and would expect all decisions on policy direction to be framed and taken in this context.

With this in mind, we have the following comments relating to the proposed policies within the NSP which are discussed in detail below. We look forward to engaging with you further in relation to the proposed NSP in the future.

### Background

The Charity are therefore principally interested in the policies relating to the London Bridge area and in particular the Guy's Hospital site.

The site lies within:

- ☑ London Bridge Area Vision
- ☑ London Bridge Health Cluster
- ☑ London Bridge District Town Centre
- ☑ Borough View Landmark Viewing Corridor: St Pauls Cathedral to Nunhead Cemetery
- ☑ Borough View Wider Setting Consultation Area: The London panorama of St Pauls Cathedral from One Tree Hill
- ☑ Archaeological Priority Area
- ☑ Bankside, Borough, London Bridge Strategic Cultural Area
- ☑ Bankside, Borough and London Bridge Opportunity Area
- ☑ Central Activities Zone

Site Allocation NSP51: London Bridge Health Cluster

Our Client is currently exploring the future options with regards to the redevelopment of London Bridge site. We fully support the principles behind site allocation NSP51 to deliver a large-scale comprehensive mixed use redevelopment to include health, retail and educational uses. However, aspects of the allocation are considered to be restrictive and we have set out our comments as below:

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. With regards to the comments on tall building, it is considered necessary to step down the buildings towards the edge of the site given the scale of the immediate surrounding buildings in order to mitigate any potential impacts on the character of the street or adjacent properties.

## Residential and Student Accommodation Uses

We note that the provision of C3 residential uses and Sui generis student accommodation uses have not been included within the proposed allocation. Our client considers the inclusion of both residential and student accommodation uses within the policy to be of key importance for ensuring that the wider redevelopment of the site can take place. The provision of market housing and/or student accommodation on site would allow our client to raise the capital required to invest in the provision of improved health, education and research facilities.

Additionally, the site lies within both the CAZ and the Bankside, Borough and London Bridge Opportunity Area. Both of these London Plan designations confirm that the London Bridge site is a suitable location for residential dwellings and student accommodation.

As such we request the following addition to the policy:

Redevelopment of the site may:

- ☑ Provide for the needs of visitors, pedestrians and the surrounding workforce through the provision of ancillary uses, including town centre uses (A1, A2, A3, A4);
- ☑ Provide other ancillary uses which would complement the health cluster (C2, D1).
- ☑ Provide residential uses (C3).
- ☑ Provide Student Accommodation (Sui generis)

Making this change will provide flexibility and ensure that our client can access the required funds to enable redevelopment of the site is dependent on the provision of residential uses on site.

Employment Floorspace

We note that the wording of the proposed site allocation NSP51 does not include specific reference to B1 office. The provision of offices supports the key function of the City and the CAZ. It is our clients understanding that office use will come forward as part of and to support the provision of the health, research and education facilities use. However, this is not clearly set out within the wording of the policy.

As such we request the following rewording of the policy:

Redevelopment of the site may:

- ☑ Provide for the needs of visitors, pedestrians and the surrounding workforce through the provision of ancillary uses, including town centre uses (A1, A2, A3, A4);
- ☑ Provide other ancillary uses which would complement the health cluster (C2, D1, B1).

Tall Buildings

We note that policy NSP51 states that 'redevelopment of the site could include taller buildings'. Our client fully supports the inclusion of this wording in the allocation site. However, we note that the policy does also state that the 'scale of any new buildings should step down towards the site boundaries'. Whilst, the client recognises the importance of ensuring that the redevelopment of the site responds to the context of the surrounding area, the policy as written is too restrictive and does take into consideration the fact that tall buildings can respond to the local environment without necessary having to reduce in scale towards the boundaries of an allocation site.

As such we request the following addition to the policy:

Redevelopment of the site could include taller buildings subject to

consideration of impacts on existing character, heritage and townscape. The scale of any new buildings should step down towards the site boundaries respond to the character, heritage and townscape of the local context.

This allows for NSP51 to remain flexible to allow for a judgement on the design merits of building to be taken parallel to the local context.

Organisation: Thames Water Utilities Ltd.  
NSPPSV184.64

Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet to discuss the water infrastructure needs relating to the Local Plan.

On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

Noted. The Council has met with Thames Water to discuss their representations relating to anticipated growth in terms of wastewater infrastructure. Thames Water will be consulted on formally once a detailed planning application is received to provide further comments on each site.

Representation	Officer Response
<p>NSP52: Land between Melior Street, St Thomas Street, Weston Street and Fenning Street</p>	
<p>Individual NSPPSV10.1</p> <p>There is not sufficient evidence to show that the local community has been engaged and participated in the process.</p> <p>Ideas and proposals from within the community including those that put the local community plans and heritage interests at the heart have been ignored thus leaving many feeling overlooked and unrepresented. These ideas have not been adequately looked into.</p> <p>It is not clear what the policies specifically are in practical terms mean for the area. A proper only be had once they the policies and their implications clearly spelled out for all to understand. The opinion of locals that are concerned about effect of tall buildings on the character, quality sustainable future of the area seem to have been considered.</p> <p>A more detailed community consultation needs for these site allocations.</p> <p>The plan does not appear to be based convincing and sound investigation. The sources are not believable.</p> <p>I do not see any proof or actual findings of the analysis with regards to the site size. Nor of the investigation into the impact on the character the area.</p> <p>We need more and up to date evidence as to these sites are going to be sympathetically and</p> <p>The policies are not real or achievable, contradictory even.</p>	<p>Noted. Policies have been through rigorous amendments with the support of 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. 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>The supporting evidence base is online setting out comprehensive reasoning behind the policies.</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>

There are internal inconsistency between the taller buildings, the site development capacity and the “enhancement” of the heritage.

The unspecified taller buildings encouraged site will almost certainly be extremely tall and obstruction overshadowing and wind tunnelling tunneling effect is already significant with the the Shard further along to the West of the sites). significant damage to the local heritage setting Horseshoe Pub, the Vinegar Warehouse and Railway Arches.

Similarly the Site Allocations are contrary to the with the London Bridge Area Vision (AV 10) which states that development should:

- Support the creation of... restored and reactivated warehouses and other heritage revealed with ‘placemarks’,
- Build on the fabric of local alleyways and yards to create quiet, green routes..
- Support the development of vibrant new high streets on St Thomas Street, Crucifix Lane and Tooley Street, complementing the distinct character of nearby Bermondsey Street.

There needs to be in the site allocation text an statement that key buildings must be retained maintained and enhanced.

Presently the wording is equivocal, it talks about ‘where possible’ the setting provided by heritage Heritage assets (like Vinegar Yard) and the setting accorded firm protection in the site allocation.

Again height restrictions need to be simply stated clear, by placing an absolute limit or by reference House and 40 Bermondsey Street to the East, tall buildings are in keeping with them, so that rise developments are not permissible.

Individual  
NSPPSV40.21

The proposals for redevelopment of the following sites are not justified because the views of the local residents have not been fully considered and taken into account. I can expand on this at the oral examination.

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 & London Plan. Southwark Council's SCI is currently in the process of being updated and any form of feedback received has been acknowledged and responded to, with all responses being uploaded online.

Individual  
NSPPSV42.4

Not Justified:

The consultation that has taken place has not allowed for effective engagement of all interested parties and thus any community and/or heritage led alternative visions for these sites have not been properly explored.

These policies have been too vague and contradictory during their evolution to allow for meaningful local consultation. Significant concerns about unprotected assets and the negative effects of tall buildings on the existing character and sustainable development of the area (at the Preferred Options Stage) have been largely ignored while at the same time the council has had numerous private meetings with prospective developers looking at the complete re-development of St Thomas Street.

Proper detailed community consultation is now required on these site allocations.

Not effective or positively prepared:

Representation is noted.

All site allocations and area visions have gone through a rigorous process of being decided which is reflected in our sites methodology paper. Each version of the NSP has also 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 & London Plan. 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.

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

The internal inconsistency between the tall buildings, the site development capacity and the intention to “retain and enhance where possible the townscape setting provided by key heritage assets” means the policies are not achievable.

When the proposed floor-to-area (FAR) ratio is considered in hand with the actual site layout and proposed public space improvements, the unspecified taller buildings encouraged to the west of the site will inevitably be very tall and by causing visual obstruction overshadowing and wind tunneling etc. cause significant damage to the local heritage setting of the Horseshoe Pub, the Vinegar Warehouse (in the case of NSP53) and the St Thomas Railway Arches and to the character of the Bermondsey more widely.

The wording of the allocations should be tightened to ensure the actual preservation of local assets and the enhancement of their settings whilst “taller buildings” should either be defined in relation to the actual adjacent context (Becket House in the case of NSP53) or simply given a specific height limit - as is indeed required by the Mayor's London Plan.

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.

Organisation: Greystar Europe Holdings  
NSPPSV73.3

#### The Site

As described in the Submission Plan, the site comprises Capital House (a multi-let office building— acquired by Greystar), Becket House (housing the UK Border Agency), with the rest of the site undeveloped and predominantly occupied by car parking. The site also includes Melior Street Community Gardens which forms the south east corner of the site, on the junction of Fenning Street and Melior Street.

#### Site Vision

We note there have been a number of changes to the Site Vision since the

Representation is noted.

The site requirements will remain that housing ‘should’ be provided on site. This is considered to provide enough flexibility in terms of site requirements as offices must be provided on site. Any proposal that comes forward for the remainder of the site will be assessed against the Development Plan and will have to take into consideration the site context, quality of design and impact on amenity of adjoining occupiers.

A fact box has been included to clarify the meaning of must, should and may at the start of the site allocations.

<p>Preferred Options draft of the plan in April last year.</p> <p>With regard to the second part of the vision, the language has sharpened from suggesting some uses ('may' provide new homes and visitor accommodation) to proposing uses that 'should' be included (residential). It is our understanding that this site should be considered as primarily commercial in use. Any residential within the site allocation would be detrimental to the office space being provided which would conflict with the draft New London Plan, namely Policy SD5 Offices, other strategic functions and residential development in the CAZ. This policy specifically notes that new residential development should not compromise the strategic functions of the CAZ of which offices is the primary function. We suggest the wording of the site allocation reverts to the original description which would allow flexibility to include residential if this did not harm the provision of office accommodation.</p> <p>The Site Vision also notes that there is an extant permission (14/AP/4640) which relates to a residential tower on the Capital House site. It should be noted that this consent is due to expire in November 2018. However, of greater relevance and material weight is the implemented consent for a tower containing student accommodation (10/AP/2754). This consent remains extant and could be built out. As such, the vision should recognise that student accommodation could also be part of the development of this site.</p>	
<p><b>Individual</b> <b>NSPPSV132.7</b></p> <p>Site Allocations NSP52 and NSP53 page 251-256 Not Justified and not Positively Prepared The plan is not founded on robust and credible evidence bases.</p> <p>Evidence of participation of the local community is poor or entirely lacking The consultation that has taken place has not allowed for effective</p>	<p>Representation noted.</p> <p>All sites and policies were rigorously assessed against the need in the borough and national and regional policies. This evidence base will be made public alongside the submission of the NSP.</p>

engagement of all interested parties, alternative options have not been properly explored and it is internally inconsistent.

#### DETAIL / PROPOSED CHANGES

These policies have been too vague, contradictory and error strewn during their evolution through to their present state to allow for any meaningful consultation to have taken place. The Old Bermondsey Neighbourhood Forum have tracked the evolution of the policies should further detail be required by the inspector. To summarise: From the Preferred Options consultation (ending in July 2017) through the Cabinet (31 Oct) and Council Assembly versions (29 Nov) to the present Submitted Version, the presentation of the site allocations has been effectively cloaking the high rise development that it arguably seeks to make permissible. Loose language on (the relationship between) tall buildings and local character, combined with the back grounding of key assumptions behind the notional scheme (that it has now become clear was being discussed with prospective developers in April 2017 if not earlier) went hand in hand with inherent contradictions stemming presumably from a deficient understanding of the site due to insufficient analysis, making the policies variously incomprehensible. An example of the many gross errors (at various stages of the evolution of these policies would be the version for Cabinet (31 Oct) having failed to adjust existing capacity figures / text in line with a fundamental change to the site area where the top of Bermondsey Street had been removed from the NSP53 allocation. An example of a continued ambiguity is the treatment of Vinegar Yard itself which has been variously deleted and mislabelled throughout and is now seemingly included in the site area when its is (verbal confirmation from the council) not actually available for development.

The vagueness and contradiction around the proposed tall buildings and how they could integrate in the setting was cause of significant concerns articulated by the local community during the consultation window in July. The negative effects of taller buildings on the character and sustainable future of the area was voiced clearly and in detail by 130 respondents to questionnaires circulated by the OBF alongside 200 letters of informed

The NSP aims to deliver a document of implementation and strategic policies that sets guidance on major development for new homes, social, green and transport infrastructure based upon the issues and objectives identified in the IIA. Policies have been through rigorous amendments with the support of input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF & London Plan. Each stage of the plan was consulted on and the evolution of policies is outlined in the evidence base which is online.

Because the NSP is a strategic document it does not include specific design guidance. It is considered that any development on the site allocation will adhere to the policies outlined in the rest of the NSP. The site allocations are therefore not providing specific detailed requirements to allow for flexibility in design. All proposals for tall buildings will be assessed on a case by case basis and will have to adhere to P14 which considers the impacts of tall buildings on the local character and heritage of the area.

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. Consultation was held at each stage of the plan with various consultation events held around the borough and this is outlined in the Consultation Report.

It is considered that any development on the site allocation will adhere to the policies outlined in the rest of the NSP. Because of this it is not necessary to reiterate the conditions that tall buildings will have to meet as any proposal for a tall building will have to adhere to P14. The site allocations are therefore not providing specific detailed requirements to allow for flexibility in design.

The capacity of individual sites is outlined in the Sites Capacity Methodology Report where different options were assessed and their potential capacities calculated. As set out in the NSP Site Allocations Methodology Report, the

local opinion objecting to the terms of the site allocations. These were over- summarised in the consultation report and mostly “dealt with” in a single reference to borough wide policy. It should be noted that 90% of people engaged in the questionnaires with had not previously been made aware (by the council) of these site allocation policies.

#### Site Allocations

NSP52 and NSP53 Not consistent with the NPPF:

Failure to comply with the NPPF paras 155 (engagement) and 157 (various) During this time (and indeed much prior to it) the Forum have sought the council’s engagement in a community and heritage led brief for NSP52 and 53 but invitations to such the Site Brief Workshops from July through October were variously declined by the planning department. These were invitations also for the department to come and explain the incoherent site allocations policies to the community. These refusals to engage have gone hand in hand with refusals to provide details of advice that has been given to prospective developers on the site behind closed doors. While the council have (by virtue of no little effort on behalf of the Forum) been forced (FOIA 867131) to an actual admission of one such set of meetings - on 29th November (coincidentally the same day that the present version of the NSP was passed at Council Assembly without any debate [after the guillotine] and without deputations being heard [attending but refused] on the subjects of Tall Buildings and St Thomas Street) - no details whatsoever have been given of the discussions themselves and moreover no previous meetings or communications have been disclosed despite the clear terms of an FOIA requesting them - informed by the council’s own previous admission that such meetings had taken place. Proper detailed community consultation should be undertaken on these Site Allocations. In the meantime the council’s private plans and communications with prospective developers to date must be given proper public scrutiny.

#### Site Allocations

NSP52 and NSP53 and by inference ALL Site Allocations (since all rely on the

site allocations do not include indicative development capacities for each site allocation because their purpose is not to provide a detailed design brief for each site. This is as stakeholders were concerned that inclusion of indicative development capacities would pre-empt the outcome of the detailed development management process. This process is outlined in the Sites Methodology Report. This report also outlines alternative options to the sites.

The preferred option plan is a result of a robust evidence base and amendments made as a result of comments and feedback at different stages of consultation.

Following the consultation on the proposed submission version, we included P70 which requires development to take into account locally listed buildings and structures that positively contribute to the local character and amenity.

The Area Vision is not at odds with the site allocations as the site allocations set out requirements for specific sites while the area vision outlines the overall vision and growth opportunities for the wider area. Any development coming forward, including those on site allocations, will be assessed on a case by case basis against the policies in the Development Plan.

#### Methodology Evidence Base)

##### Not Justified:

The plan is not founded on robust and credible evidence bases / the sources of evidence are not convincing. There is not a clear cut audit trail of how and why the preferred approach was arrived at. Alternative options have not been properly explored. There is no actual evidence (work described as having been undertaken in the Site Allocations Methodology paper) of detailed/iterative site analysis in relation to site capacity and similarly no evidence of proper investigations having been made into the potential effects on character and local heritage. To this end the attached letter of (21st January) - which has not been answered – asks for examples of working processes equating to Para. 3.11 (site capacity) and 3.2 (character, non-designated assets etc.). It then asks for evidence of how 3 key parts of the Integrated Impact Assessment (Historic England Good Practice Advice Note on P81 and IIAs 11 and 12 have been applied to the site allocations when in combination with the consultation received to date they would surely call into question the way tall buildings are still dominating the policies.

##### Site Allocations

##### NSP52 and NSP53

##### DETAIL / PROPOSED CHANGES

More evidence should be gathered / made clear on how these sites are to be sensitively and sustainably developed using appropriate methods (currently lacking). There is no reason to assume that the failure to undertake the processes outlined in the methodology background paper are limited to NSP52&53 and the requirement for new evidence (to then be properly consulted on) therefore implicates ALL the site allocation policies - not just those whose sites -like NSP53 - constitute incredibly valuable and sensitive local heritage contexts but also those where for example the local economic and cultural uses and values have not been sufficiently if at all understood.

##### Site Allocations

NSP52 and NSP53 and by inference ALL Site Allocations (since all rely on the

the Methodology Evidence Base)

Not Effective

Not Positively Prepared

Not Justified

Incapable of being monitored because the sites are not sufficiently well understood, leading to inevitable gaps/inconsistencies (not positively prepared) in terms of how the spaces and uses (informal / cultural / economic) and the local character of the sites (can) contribute to the environmental economic and social sustainability of their wider settings. Consequently the aims of the Area Visions are not achievable and along with the Site Allocations are not justified.

#### DETAIL / PROPOSED CHANGES

In addition to the aforementioned non-credible evidence base (the site analysis described in the methodology) there is no Local List policy in the NSP. In addition to these deficiencies there a severe gap in the evidence base that supports the Strong Local Economy policies. These deficiencies compound to constitute a severe failure in understanding the relationship between the functioning of the local economy and the role of the existing built fabric as it is currently occupied. There has been no study to link these subjects arising from the Impact Assessment. In terms of character alone the Characterisation Studies for Bermondsey are out of date. Despite this they have been used (erroneously) to mis-define the boundary of the OBF Neighbourhood Area. Neighbourhood plans (with polices like Site Briefs for example) are a tool which could inform or indeed replace the Site Allocation policies in some areas (deficient as they are in credible evidence / processes to support them): Local knowledge and understanding of use and (potential) cultural value of sites should be being drawn out and tied into the Area Visions.

Both within and aside from (emerging) NPs, an audit of the local economy (in each Area Vision for example) combined with a Local List initiative could go some way to addressing this severe deficiency in the NSP's effective understanding of its subject.

#### Site Allocation NSP53

Not Effective (not achievable)

Not Positively Prepared (inconsistencies)

Because the internal inconsistency between the taller buildings, the site development capacity and the “enhancement” of the heritage setting means the policies are not achievable. Similarly the Site Allocations are at odds with the London Bridge Area Vision (AV 10) which states that development should: Support the creation of... restored and reactivated warehouses and other heritage revealed with ‘placemarks’, - Build on the fabric of local alleyways and yards to create quiet, green routes.. - Support the development of vibrant new high streets on St Thomas Street, Crucifix Lane and Tooley Street, complementing the distinct character of nearby Bermondsey Street.

#### DETAIL / PROPOSED CHANGES

When the proposed FAR ratio is considered in hand with the actual site layout (including the Vinegar Yard) and the intended public space improvements are accounted for (not 15% of Site Area as stated but in fact 1000sqm according to the evidence bases, the unspecified taller buildings encouraged to the west of the site will inevitably be very tall and by causing visual obstruction overshadowing and wind tunnelling etc. cause significant damage to the sensitive and valuable local heritage setting of the Horseshoe Pub, the Vinegar Warehouse and the Grade II listed Railway Arches. The wording of the site allocation text as it stands should be amended to remove the ambiguity that allows for the demolition of actual buildings / fabric like the Vinegar Yard Warehouse for example which despite being listed on ‘placemarks’, is only afforded protection by the phrase “development proposals should seek to retain and enhance where possible the townscape setting provided by key heritage assets..” Rather the guidance should be to the effect that the key buildings be retained and their settings enhanced.

Area Vision  
AV10

<p>Site Allocations NSP52 and NSP53 Not Justified (robust evidence) Not Positively Prepared or effective (no clear links and not monitorable ) DETAIL / PROPOSED CHANGES Similarly the damaging imposition of high-rise development should be mitigated by simply stating a clear height limit. This could be an actual height (as per the London Plan) or at least in the form of a guide that tall buildings should be in line with Becket House to the West and No. 40 Bermondsey Street to the East.</p> <p>evidence are not convincing. 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, alternative options have not been properly explored and it is internally inconsistent.</p>	
<p>Organisation: Team London Bridge NSPPSV179.10</p> <p>26. The London Bridge Plan identifies the opportunity for a step change in the quality of development along the southern side of London Bridge Station through the creation of the St Thomas Street Boulevard. This will require a strong urban design framework, an integrated approach to its development and a shared space approach to the street.</p> <p>27. We believe delivery of the Boulevard requires a more unifying approach than is evident in the three separate site allocations that run along St Thomas Street. Sites NSP 51, 52 and 53 form a contiguous allocation along the southern edge of St Thomas Street and so share common characteristics. We believe there would be significant advantages in combining NSP 52 and NSP 53 into a single allocation with its future development guided by a coherent masterplan.</p> <p>28. The site allocations for NSP 51, 52 and 53 would be strengthened by:</p> <ul style="list-style-type: none"> <li>• Recognising their individual and collective contribution to the development</li> </ul>	<p>Representation noted.</p> <p>NSP 51, NSP52 and NSP53 are identified separate sites to identify the separate uses of the individual sites. Therefore it assumes a mix of uses could be provided, requiring the re-provision of employment uses in line with other policies in the CAZ and housing requirements. This includes NSP51 which intends to protect the existing land use although the site may also provide town centre uses. The site vision diagram also includes improved connectivity to St Thomas Street. Both NSP 52 and NPS 53 include direct reference to enhancing St Thomas Street.</p> <p>As the NSP is a strategic document it does not include specific or prescriptive design guidance to allow for the flexibility of design but the requirement of town centre uses would allow for the improvement of St Thomas St and the</p>

of St Thomas Street as a high street, including part pedestrianisation and support for town centre uses and active frontages at ground level (and also potentially above ground floor) and set back from the St Thomas Street frontage

- Supporting the need for a mix of floorplate sizes to encourage retail and office diversity
- Avoiding a single, monolithic elevation along St Thomas Street
- Acknowledging the need for future development to respect the food, culture and retail offer in Bermondsey Street and the station
- Addressing the future impact of development on the microclimate and shading and requiring development to mitigate the impact of development on wind speeds along St Thomas Street and adjacent areas
- Establishing a stronger expectation for retaining and enhancing the townscape and undesignated heritage assets
- Increasing permeability and delivering an overall increase in public open space
- Supporting the need for sustainable drainage given the area is a critical drainage zone

Recommendation

- Amend site allocations NSP 51, 52 and 53 to secure a more integrated approach to the development of the St Thomas Street Boulevard.

townscape.

Organisation: Thames Water Utilities Ltd  
NSPPSV184.65

The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered

On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

Noted. Notwithstanding the above, applicants will still be notified to consult with Thames Water.

Individual  
NSPPSV193.5

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 Areas, eroding their settings, views and compromising the historic character and distinctiveness.

Detail/ Proposed Changes.

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 plan is not founded on robust and credible evidence bases / the sources

Representation noted.

The NSP sets out a number of policies that take into account the protection and enhancement of heritage assets when redeveloping any site. All developments will be assessed on a case by case basis and decided on the merits of the application and the Development Plan which includes policies on conservation areas and local heritage assets and design. Consultations on planning applications last a statutory 21 days and this will be outlined in the council's new SCI.

All sites and policies were rigorously assessed against the need in the borough and national and regional policies. This evidence base will be made public alongside the submission of the NSP.

The NSP aims to deliver a document of implementation and strategic policies that sets guidance on major development for new homes, social, green and transport infrastructure based upon the issues and objectives identified in

of evidence are not convincing. 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, alternative options have not been properly explored and it is internally inconsistent.

#### Detail/ Proposed Changes.

These policies have been too vague, contradictory and error strewn during their evolution through to their present state to allow for any meaningful consultation to have taken place. The Old Bermondsey Neighbourhood Forum have tracked the evolution of the policies should further detail be required by the inspector. To summarise: From the Preferred Options consultation (ending in July 2017) through the Cabinet (31 Oct) and Council Assembly versions (29 Nov) to the present Submitted Version, the presentation of the site allocations has been effectively cloaking the high rise development that it arguably seeks to make permissible. Loose language on (the relationship between) tall buildings and local character, combined with the back grounding of key assumptions behind the notional scheme (that it has now become clear was being discussed with prospective developers in April 2017 if not earlier) went hand in hand with inherent contradictions stemming presumably from a deficient understanding of the site due to insufficient analysis, making the policies variously incomprehensible. An example of the many gross errors (at various stages of the evolution of these policies would be the version for Cabinet (31 Oct) having failed to adjust existing capacity figures / text in line with a fundamental change to the site area where the top of Bermondsey Street had been removed from the NSP53 allocation.

An example of a continued ambiguity is the treatment of Vinegar Yard itself which has been variously deleted and mislabelled throughout and is now seemingly included in the site area when it is (verbal confirmation from the council) not actually available for development.

The vagueness and contradiction around the proposed tall buildings and how

the IIA. Policies have been through rigorous amendments with the support of input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF & London Plan. Each stage of the plan was consulted on and the evolution of policies is outlined in the evidence base which is online.

Because the NSP is a strategic document it does not include specific design guidance. It is considered that any development on the site allocation will adhere to the policies outlined in the rest of the NSP. The site allocations are therefore not providing specific detailed requirements to allow for flexibility in design. All proposals for tall buildings will be assessed on a case by case basis and will have to adhere to P14 which considers the impacts of tall buildings on the local character and heritage of the area.

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. Consultation was held at each stage of the plan with various consultation events held around the borough and this is outlined in the Consultation Report.

It is considered that any development on the site allocation will adhere to the policies outlined in the rest of the NSP. Because of this it is not necessary to reiterate the conditions that tall buildings will have to meet as any proposal for a tall building will have to adhere to P14. The site allocations are therefore not providing specific detailed requirements to allow for flexibility in design.

The capacity of individual sites is outlined in the Sites Capacity Methodology Report where different options were assessed and their potential capacities calculated. This process is outlined in the Sites Methodology Report. This report also outlines alternative options to the sites. As set out in the NSP Site Allocations Methodology Report, the site allocations do not include indicative development capacities for each site allocation because their purpose is not

they could integrate in the setting was cause of significant concerns articulated by the local community during the consultation window in July. The negative effects of taller buildings on the character and sustainable future of the area was voiced clearly and in detail by 130 respondents to questionnaires circulated by the OBF alongside 200 letters of informed local opinion objecting to the terms of the site allocations. These were over-summarised in the consultation report and mostly “dealt with” in a single reference to borough wide policy. It should be noted that 90% of people engaged in the questionnaires with had not previously been made aware (by the council) of these site allocation policies.

Not consistent with the NPPF:

Failure to comply with the NPPF paras 155(engagement) and 157 (various):

Detail/ Proposed Changes.

During this time (and indeed much prior to it i) the Forum have sought the council’s engagement in a community and heritage led brief for NSP52 and 53 but invitations to such the Site Brief Workshops from July through October were variously declined by the planning department. These were invitations also for the department to come and explain the incoherent site allocations policies to the community. These refusals to engage have gone hand in hand with refusals to provide details of advice that has been given to prospective developers on the site behind closed doors. While the council have (by virtue of no little effort on behalf of the Forum) been forced (FOIA 867131) to an actual admission of one such set of meetings - on 29th November (coincidentally the same day that the present version of the NSP was passed at Council Assembly without any debate [after the guillotine] and without deputations being heard [attending but refused] on the subjects of Tall Buildings and St Thomas Street) - no details whatsoever have been given of the discussions themselves and moreover no previous meetings or communications have been disclosed despite the clear terms of an FOIA

to provide a detailed design brief for each site. This is as stakeholders were concerned that inclusion of indicative development capacities would pre-empt the outcome of the detailed development management process.

The preferred option plan is a result of a robust evidence base and amendments made as a result of comments and feedback at different stages of consultation.

Following the consultation on the proposed submission version, we included P70 which requires development to take into account locally listed buildings and structures that positively contribute to the local character and amenity.

requesting them - informed by the council's own previous admission that such meetings had taken place. Proper detailed community consultation should be undertaken on these Site Allocations. In the meantime the council's private plans and communications with prospective developers to date must be given proper public scrutiny.

Not Justified: The plan is not founded on robust and credible evidence bases / the sources of evidence are not convincing. There is not a clear cut audit trail of how and why the preferred approach was arrived at. Alternative options have not been properly explored.

#### Detail/ Proposed Changes

There is no actual evidence (work described as having been undertaken in the Site Allocations Methodology paper) of detailed/iterative site analysis in relation to site capacity and similarly no evidence of proper investigations having been made into the potential effects on character and local heritage. To this end the attached letter of (21st January) - which has not been answered - asks for examples of working processes equating to Para. 3.11 (site capacity) and 3.2 (character, non-designated assets etc.). It then asks for evidence of how 3 key parts of the Integrated Impact Assessment (Historic England Good Practice Advice Note on P81 and IIAs 11 and 12 have been applied to the site allocations when in combination with the consultation received to date they would surely call into question the way tall buildings are still dominating the policies.

More evidence should be gathered / made clear on how these sites are to be sensitively and sustainably developed using appropriate methods (currently lacking). There is no reason to assume that the failure to undertake the processes outlined in the methodology background paper are limited to NSP52&53 and the requirement for new evidence (to then be properly consulted on) therefore implicates ALL the site allocation policies - not just

those whose sites -like NSP53 - constitute incredibly valuable and sensitive local heritage contexts but also those where for example the local economic and cultural uses and values have not been sufficiently if at all understood.

Organisation: Zurich Assurance Ltd c/o Threadneedle Portfolio Services Ltd ('Threadneedle')  
NSPPSV216.3

We welcome the identification of Becket House within draft Allocation NSP52 and the recognition that the site should be comprehensively redeveloped. However, despite previously raising concerns to both the Preferred Option version of the NSP and the Area Visions and Allocations document, the draft allocation continues to shackle the proposed redevelopment of the site, particularly in terms of land use, and request that it is amended as set out below.

#### Site Vision and Required uses

We welcome that a mix of uses on site is proposed including town centre uses at ground floor including restaurants, shops, and bars, with employment, residential uses above. We understand and agree that the provision of active frontages and high quality public realm along a revitalised St Thomas Street will be hugely important to the success of any redevelopment project. However, it seems that the potential introduction of other uses such as hotel uses have been removed and that there appears to be greater emphasis on the need to provide office floorspace. Viability will be central to ensuring that the right scheme comes forward on the site. An appropriate mix of uses, which may include a hotel, is vitally important to ensuring this viability. We therefore encourage a wider list of proposed uses to be included within the allocation. Principally, however, we believe that the potential requirement to deliver 50% of any redevelopment as office space is overly prescriptive at this stage. The priority is to deliver an appropriate mix of uses that ensures that the potential of this highly accessible site is optimised. The current proposed wording is therefore overly prescriptive and inflexible and could prejudice development from coming forward.

Representation noted.

The site allocation in the Preferred Option version to the NSP (2015) included reference that the site 'may' include new homes or new visitor accommodation. Employment uses and active frontages were listed as required uses. In the NSP Proposed Submission Version (2017) the site continues to list employment uses and active frontages as required uses and the reference that the site 'should' provide new homes. However, references to new visitor accommodation were removed from all site allocations in the plan with the exception of key strategic development sites in the Canada Water and Old Kent Road opportunity areas. This was due to ensuring the site allocations set out a concise list of required uses and where other uses are proposed this would be assessed against normal development management policies and in the context of meeting the requirements of the site allocation.

The Site Allocation gives a guide for replacement employment floorspace to be provided in redevelopment. This has been determined through the Employment Land Review. The requirement to re provide at least the amount of employment floorspace (B class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater is not to prescriptive and is justified through a robust evidence base. The site allocation gives a guide for replacement employment floorspace to be provided in redevelopment. Replacement employment floorspace is specified in accordance with the Employment Land Review.

It is essential that the policy is flexibly worded.

The provision of at least 50% of the redeveloped site would yield significantly more office space than currently exists on site. The requirement to re-provide the existing level of offices on site is understood but to overly prescribe the balance of uses within the additional floorspace on site would be unhelpful at this stage and may discourage redevelopment of the site in the short-medium term. We strongly believe that the use of any uplift in floorspace should be open for discussion during the pre-application and application stages.

The concerns expressed above are reinforced in the Southwark Employment Land Study (Part 2) April 2016 prepared by CAG Consultants. Although expressed in relation to the Old Kent Road Opportunity Area, the difficulties in achieving a viable mix of uses on site are set out in Section 6.7 and concludes that policies should not be prescriptive or restrictive when delivering employment in mixed-use developments:

Trying to achieve the employment element of mixed-use developments through prescriptive or restrictive planning clauses can be problematic as the market will need to respond to provide an effective product for occupiers. In trying to plan for employment space in a mixed-use development setting targets for the proportions of land-use or even floorspace are unlikely to be the best way of achieving a successful employment component for a development. Even numbers of jobs on their own, notoriously difficult to achieve as a planning target, may also be too crude a measure. The type of economic activity is important to consider in a mixed-use development as is creating the type of environment that is going to encourage sustainable growth of employment activity. ....

Flexibility in terms of delivering mixed use employment objectives is important. So, rather than a generic policy or restricted policies, each scheme should be looked at case by case.

Draft Policy P9 requires development to optimise the use of land to deliver the council's target of 2,376 homes per year. Furthermore, the draft London Bridge Opportunity Development Area proposes that the opportunity areas should deliver in excess of 1,900 homes. Residential uses are therefore a key

The density matrix has been removed from P9 to be in line with the London Plan. The site vision requires residential use to be provided on the site.

Any proposal will be assessed against the Development Plan including design, heritage and tall building policies.

requirement for the area and every opportunity should be explored in development proposals to maximise their contribution.

The overall vision of the London Bridge Opportunity Area is to provide a vibrant and mixed-use area for people to come to. This will be delivered by optimising residential and non-residential densities, with the provision of a minimum of 1,900 new homes and around 25,000 new jobs by 2026.

**Indicative Development Capacity** We welcome that an indicative development capacity for the site has been removed, the design process to dictate the potential of the site. The site has a PTAL rating of 6b and is adjacent to London Bridge station. The site is therefore in a highly sustainable location where capacity should be maximised.

#### **Design and Accessibility Guidance**

We welcome that the draft allocation states that the site could include taller buildings. However, the draft allocation then goes on to conclude that the taller buildings should be located towards the west of the site. As set out earlier in the section, the location of the taller buildings should be subject to consideration of impacts on existing character, heritage, and detailed townscape analysis, and not prejudged in the draft allocation.

Our initial townscape analysis shows that a tall building could be located to the east of the allocation and would not impact on the amenity of surrounding properties and townscape, and could preserve and enhance the character of the area. We therefore propose that the reference to taller buildings only being positioned on the west of the site be removed and the conclusion of where a taller building is suitable be left to the planning application process.

Representation	Officer Response
<p>NSP53: Land between St Thomas Street, Fenning Street, Melior Place, and Snowsfields</p>	
<p>Individual NSPPSV10.2</p> <p>There is not sufficient evidence to show that the local community has been engaged and participated in the process.</p> <p>Ideas and proposals from within the community including those that put the local community plans and heritage interests at the heart have been ignored thus leaving many feeling overlooked and unrepresented. These ideas have not been adequately looked into.</p> <p>It is not clear what the policies specifically are in practical terms mean for the area. A proper only be had once they the policies and their implications clearly spelled out for all to understand. The opinion of locals that are concerned about effect of tall buildings on the character, quality sustainable future of the area seem to have been considered.</p> <p>A more detailed community consultation needs for these site allocations.</p> <p>The plan does not appear to be based convincing and sound investigation. The sources are not believable.</p> <p>I do not see any proof or actual findings of the analysis with regards to the site size. Nor of the investigation into the impact on the character the area.</p> <p>We need more and uptodate evidence as to these sites are going to be sympathetically and</p> <p>The policies are not real or achievable, contradictory even.</p>	<p>Representation noted.</p> <p>Consultation was held at several stages in the process and has helped strengthen NSP policies. Southwark Council's SCI is currently in the process of being updated and any form of feedback received has been acknowledged and responded to, with all responses being uploaded online. The consultation report will outline what consultation events were held with the community.</p> <p>Policies have been through rigorous amendments based on input from statutory and other consultee as well as an evidence base which will be made public alongside the final submission of the NSP.</p> <p>The detail of heights of tall buildings shall not be covered in the NSP as it is a strategic policy document, but where tall buildings are suggested on site allocations the associated area visions AAP or SPD will provide more details. Tall buildings will be assessed on a case by case in order to mitigate against any potential impacts and will also be subject to P14 of the NSP which sets out criteria that tall buildings must meet including considering the local distinctiveness of an area.</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</p>

There are internal inconsistency between the taller buildings, the site development capacity and the “enhancement” of the heritage.

The unspecified taller buildings encouraged site will almost certainly be extremely tall and obstruction overshadowing and wind tunnelling tunnelling effect is already significant with the the Shard further along to the West of the sites). significant damage to the local heritage setting Horseshoe Pub, the Vinegar Warehouse and Railway Arches.

Similarly the Site Allocations are contrary to the with the London Bridge Area Vision (AV 10) which states that development should:

- Support the creation of... restored and reactivated warehouses and other heritage revealed with ‘placemarks’,
- Build on the fabric of local alleyways and yards to create quiet, green routes..
- Support the development of vibrant new high streets on St Thomas Street, Crucifix Lane and Tooley Street, complementing the distinct character of nearby Bermondsey Street.

There needs to be in the site allocation text an statement that key buildings must be retained maintained and enhanced.

Presently the wording is equivocal, it talks about ‘where possible’ the setting provided by heritage Heritage assets (like Vinegar Yard) and the setting accorded firm protection in the site allocation.

Again height restrictions need to be simply stated clear, by placing an absolute limit or by reference House and 40 Bermondsey Street to the East, tall buildings are in keeping with them, so that rise developments are not permissible.

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.

The Area Vision is not considered to be contrary to the site allocations as site allocations do not make up the entire Area and future developments will need to consider the Area Vision.

'Site allocation - NSP53' and 'Tall buildings – P14' policies are clearly intended to facilitate High-Rise buildings on St Thomas St. The former in particular aims to drive a high-rise wedge between the listed arches in St Thomas St and the Bermondsey St Conservation area, the heritage assets of the Vinegar Yard warehouse and the Horseshoe pub.

NSP 53 has not been genuinely consulted upon. The only 'consultation' that the Council engaged in was in relation to a version that was ill-conceived, obsolete, inadequately explained and failed give any coherent account of what it is intended to endorse by way of development.

The site brief presents itself as authorising 'tall buildings' but there is no indication as to how or such buildings could be incorporated on the site, nor any indication of acceptable heights, contrary to the London Plan. Neither is there any explanation of how tall buildings represent considered development potential where the site is interposed between the listed St Thomas St viaduct arches and the acknowledged unlisted heritage assets of the Horseshoe pub and the Vinegar Yard warehouse, as well as the Bermondsey St conservation area, to the south.

The site brief relates to a site that does not exist as a distinct site, either as to ownership or coherence. It takes in the Vinegar Yard warehouse and other parts of the conservation area. If, as the Council have told us (verbally only), the site brief is intended to be clear that the warehouse is to be preserved then (a) it should say so in terms, and (b) it should be amended to remove the warehouse from the site plan as the land it occupies is not available for new development in any case. Consequently, the proposed development area and proposed uses are unintelligible and unachievable whilst meeting other stipulations in the brief. I.e. it is internally inconsistent.

Representation noted.

Consultation was held at several stages in the process and has helped strengthen NSP policies. Southwark Council's SCI is currently in the process of being updated and any form of feedback received has been acknowledged and responded to, with all responses being uploaded online. The consultation report will outline what consultation events were held with the community.

The NSP is a strategic document and specific design criteria are not outlined in the site allocations. All development that come forward will be assessed against the development management policies in the plan including policies relating to design.

Tall buildings will be assessed on a case by case in order to mitigate against any potential impacts and will also be subject to P14 of the NSP which sets out criteria that tall buildings must meet including considering the local distinctiveness of an area.

As this site is in the CAZ, employment uses will be prioritised. Any housing that is proposed will have to adhere to development management policies including policies on affordable housing.

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

Further, the site is shown to include the public thoroughfare of Vinegar Yard. On the other hand, the Council has confirmed to us (again only verbally) that they have no intention of handing over Vinegar Yard to a developer. This should be explicit and without such clarity the brief exhibits further unacceptable ambiguity. It also affects significantly the site area. There is no reasoning or evidence to support the policy of introduction of residential development in this location, which is elsewhere argued by the Council to be exclusively suited to business or other non-residential uses. Certainly there is no consideration shown as to how residential development in this location could contribute to housing other than at the very top end of the price spectrum, alien to local people and contributing nothing to the stock of affordable housing.

The reason that the site brief is unintelligible is clear: There has been no properly considered assessment of the site and its capacity for development or the relationship between feasible density, building heights and the insufficiently particularized, but nevertheless acknowledged, constraints presented by immediate heritage assets and conservation and townscape considerations. The Council has been called upon repeatedly to give a coherent methodology for their arrival at the terms of the site allocation but they have consistently refused to do so. In practice, the only basis for the site allocation as it stands is compliance with demands from developers in disregard of local consultations carried out by the Old Bermondsey Village Neighbourhood Forum (OBVNF).

The Council carrying out proper consultation and not ignoring the results can address all the defects listed above. They must abandon the intentional ambiguity in the site brief and be specific about what is intended and the evidence on which it is based. There should be clear statements on what is to be preserved of the affected heritage assets, that Vinegar Yard is to remain a public road and, if the brief is to endorse tall buildings, specify their height limits and locations to which they are said to be suited.

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.

Individual  
NSPPSV40.22

The proposals for redevelopment of the following sites are not justified because the views of the local residents have not been fully considered and taken into account. I can expand on this at the oral examination.

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 & London Plan. Southwark Council's SCI is currently in the process of being updated and any form of feedback received has been acknowledged and responded to, with all responses being uploaded online.

Individual  
NSPPSV42.5

Not Justified:

The consultation that has taken place has not allowed for effective engagement of all interested parties and thus any community and/or heritage led alternative visions for these sites have not been properly explored.

These policies have been too vague and contradictory during their evolution to allow for meaningful local consultation. Significant concerns about unprotected assets and the negative effects of tall buildings on the existing character and sustainable development of the area (at the Preferred Options Stage) have been largely ignored while at the same time the council has had numerous private meetings with prospective developers looking at the complete re-development of St Thomas Street.

Proper detailed community consultation is now required on these site allocations.

Not effective or positively prepared.

The internal inconsistency between the tall buildings, the site development capacity and the intention to "retain and enhance where possible the

Representation is noted.

Consultation was held at several stages in the process and has helped strengthen NSP policies. Southwark Council's SCI is currently in the process of being updated and any form of feedback received has been acknowledged and responded to, with all responses being uploaded online. The consultation report will outline what consultation events were held with the community.

Policies have been through rigorous amendments with the support of input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF & London Plan. All of the evidence base is public.

Any development on the site allocation will adhere to the policies outlined in the rest of the NSP. The site allocations are therefore not providing specific detailed requirements to allow for flexibility in design. Any tall building on the site would be required to follow P14 which sets out the set of criteria considered necessary to achieve a suitable tall building, this includes considering the local distinctiveness of the area. Any proposal for a tall

<p>townscape setting provided by key heritage assets” means the policies are not achievable.</p> <p>When the proposed floor-to-area (FAR) ratio is considered in hand with the actual site layout and proposed public space improvements, the unspecified taller buildings encouraged to the west of the site will inevitably be very tall and by causing visual obstruction overshadowing and wind tunneling etc. cause significant damage to the local heritage setting of the Horseshoe Pub, the Vinegar Warehouse (in the case of NSP53) and the St Thomas Railway Arches and to the character of the Bermondsey more widely.</p> <p>The wording of the allocations should be tightened to ensure the actual preservation of local assets and the enhancement of their settings whilst “taller buildings” should either be defined in relation to the actual adjacent context (Becket House in the case of NSP53) or simply given a specific height limit - as is indeed required by the Mayor's London Plan.</p>	<p>building would be assessed on a case by case basis in order to mitigate any potential negative impacts.</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><b>Individual</b> <b>NSPPSV132.8</b></p> <p>Site Allocations NSP52 and NSP53 page 251-256 Not Justified Not Positively Prepared the plan is not founded on robust and credible evidence bases / the sources of Site Allocations NSP52 and NSP53 page 251-256 Not Justified Not Positively Prepared The plan is not founded on robust and credible evidence bases / the sources of evidence are not convincing. 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, alternative options have not been properly explored and it is internally inconsistent. DETAIL / PROPOSED CHANGES These policies have been too vague, contradictory and error strewn during their evolution through to their present state to allow for any meaningful</p>	<p>Representation is noted.</p> <p>Policies have been through rigorous amendments with the support of 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. All evidence base will be made public alongside the final submission of the NSP.</p> <p>Consultation was held at several stages in the process and has helped strengthen NSP policies. Southwark Council's SCI is currently in the process of being updated and any form of feedback received has been acknowledged and responded to, with all responses being uploaded online. The consultation report will outline what consultation events were held with the community.</p>

consultation to have taken place. The Old Bermondsey Neighbourhood Forum have tracked the evolution of the policies should further detail be required by the inspector. To summarise: From the Preferred Options consultation (ending in July 2017) through the Cabinet (31 Oct) and Council Assembly versions (29 Nov) to the present Submitted Version, the presentation of the site allocations has been effectively cloaking the high rise development that it arguably seeks to make permissible. Loose language on (the relationship between) tall buildings and local character, combined with the back grounding of key assumptions behind the notional scheme (that it has now become clear was being discussed with prospective developers in April 2017 if not earlier) went hand in hand with inherent contradictions stemming presumably from a deficient understanding of the site due to insufficient analysis, making the policies variously incomprehensible. An example of the many gross errors (at various stages of the evolution of these policies would be the version for Cabinet (31 Oct) having failed to adjust existing capacity figures / text in line with a fundamental change to the site area where the top of Bermondsey Street had been removed from the NSP53 allocation. An example of a continued ambiguity is the treatment of Vinegar Yard itself which has been variously deleted and mislabelled throughout and is now seemingly included in the site area when it is (verbal confirmation from the council) not actually available for development.

The vagueness and contradiction around the proposed tall buildings and how they could integrate in the setting was cause of significant concerns articulated by the local community during the consultation window in July. The negative effects of taller buildings on the character and sustainable future of the area was voiced clearly and in detail by 130 respondents to questionnaires circulated by the OBF alongside 200 letters of informed local opinion objecting to the terms of the site allocations. These were over-summarised in the consultation report and mostly “dealt with” in a single reference to borough wide policy. It should be noted that 90% of people engaged in the questionnaires with had not previously been made aware (by the council) of these site allocation policies.

The NSP is intended to be a strategic document so prescriptive design guidance is not included in the site allocations to allow for flexibility in design. As the NSP is intended to be read as a whole, the design policies relating to the protection of local cultural and heritage assets will need to be adhered to for any development that is brought forward. Any proposals for tall buildings will be assessed against these policies and other relevant policies in the development plan.

The sites methodology paper outlines the methods used to assess the potential capacities of the sites. All of these capacities are indicative and not prescriptive. The site capacities were reached with different officers making different assumptions about the site. A detailed design proposal would need to be put forward to have a definite site capacity but as the NSP is a strategic document indicative capacities are used only. For this reason, the site requirements act as a guide for development are not a site brief.

The area vision outlines the overall vision for the area, while the sites outline the requirements for specific areas to achieve the overall vision. Therefore, the aims of the area visions can be achieved through the combination of the site allocations within the area vision.

A local list policy was added to the Amended Version of the plan in January 2019.

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

#### Site Allocations

NSP52 and NSP53 Not consistent with the NPPF:

Failure to comply with the NPPF paras 155 (engagement) and 157 (various) During this time (and indeed much prior to it i) the Forum have sought the council's engagement in a community and heritage led brief for NSP52 and 53 but invitations to such the Site Brief Workshops from July through October were variously declined by the planning department. These were invitations also for the department to come and explain the incoherent site allocations policies to the community. These refusals to engage have gone hand in hand with refusals to provide details of advice that has been given to prospective developers on the site behind closed doors. While the council have (by virtue of no little effort on behalf of the Forum) been forced (FOIA 867131) to an actual admission of one such set of meetings - on 29th November (coincidentally the same day that the present version of the NSP was passed at Council Assembly without any debate [after the guillotine] and without depositions being heard [attending but refused] on the subjects of Tall Buildings and St Thomas Street) - no details whatsoever have been given of the discussions themselves and moreover no previous meetings or communications have been disclosed despite the clear terms of an FOIA requesting them - informed by the council's own previous admission that such meetings had taken place. Proper detailed community consultation should be undertaken on these Site Allocations. In the meantime the council's private plans and communications with prospective developers to date must be given proper public scrutiny.

#### Site Allocations

NSP52 and NSP53 and by inference ALL Site Allocations (since all rely on the Methodology Evidence Base)

Not Justified:

The plan is not founded on robust and credible evidence bases / the sources of evidence are not convincing. There is not a clear cut audit trail of how and why the preferred approach was arrived at. Alternative options have not been properly explored. There is no actual evidence (work described as having

Buildings and Structures, P17 Conservation Areas, and P18 Conservation of Historic environment and natural heritage.

been undertaken in the Site Allocations Methodology paper) of detailed/iterative site analysis in relation to site capacity and similarly no evidence of proper investigations having been made into the potential effects on character and local heritage. To this end the attached letter of (21st January) - which has not been answered – asks for examples of working processes equating to Para. 3.11 (site capacity) and 3.2 (character, non-designated assets etc.). It then asks for evidence of how 3 key parts of the Integrated Impact Assessment (Historic England Good Practice Advice Note on P81 and IIAs 11 and 12 have been applied to the site allocations when in combination with the consultation received to date they would surely call into question the way tall buildings are still dominating the policies.

#### Site Allocations

NSP52 and NSP53

#### DETAIL / PROPOSED CHANGES

More evidence should be gathered / made clear on how these sites are to be sensitively and sustainably developed using appropriate methods (currently lacking). There is no reason to assume that the failure to undertake the processes outlined in the methodology background paper are limited to NSP52&53 and the requirement for new evidence (to then be properly consulted on) therefore implicates ALL the site allocation policies - not just those whose sites -like NSP53 - constitute incredibly valuable and sensitive local heritage contexts but also those where for example the local economic and cultural uses and values have not been sufficiently if at all understood.

#### Site Allocations

NSP52 and NSP53 and by inference ALL Site Allocations (since all rely on the the Methodology Evidence Base)

Not Effective

Not Positively Prepared

Not Justified

Incapable of being monitored because the sites are not sufficiently well understood, leading to inevitable gaps/inconsistencies (not positively

prepared) in terms of how the spaces and uses (informal / cultural / economic) and the local character of the sites (can) contribute to the environmental economic and social sustainability of their wider settings. Consequently the aims of the Area Visions are not achievable and along with the Site Allocations are not justified.

#### DETAIL / PROPOSED CHANGES

In addition to the aforementioned non-credible evidence base (the site analysis described in the methodology) there is no Local List policy in the NSP. In addition to these deficiencies there a severe gap in the evidence base that supports the Strong Local Economy policies. These deficiencies compound to constitute a severe failure in understanding the relationship between the functioning of the local economy and the role of the existing built fabric as it is currently occupied. There has been no study to link these subjects arising from the Impact Assessment. In terms of character alone the Characterisation Studies for Bermondsey are out of date. Despite this they have been used (erroneously) to mis-define the boundary of the OBF Neighbourhood Area. Neighbourhood plans (with polices like Site Briefs for example) are a tool which could inform or indeed replace the Site Allocation policies in some areas (deficient as they are in credible evidence / processes to support them): Local knowledge and understanding of use and (potential) cultural value of sites should be being drawn out and tied into the Area Visions.

Both within and aside from (emerging) NPs, an audit of the local economy (in each Area Vision for example) combined with a Local List initiative could go some way to addressing this severe deficiency in the NSP's effective understanding of its subject.

Site Allocation NSP53

Not Effective (not achievable)

Not Positively Prepared (inconsistencies)

Because the internal inconsistency between the taller buildings, the site development capacity and the "enhancement" of the heritage setting means the policies are not achievable. Similarly the Site Allocations are at odds with

the London Bridge Area Vision (AV 10) which states that development should: Support the creation of... restored and reactivated warehouses and other heritage revealed with 'placemarks', - Build on the fabric of local alleyways and yards to create quiet, green routes.. - Support the development of vibrant new high streets on St Thomas Street, Crucifix Lane and Tooley Street, complementing the distinct character of nearby Bermondsey Street.

#### DETAIL / PROPOSED CHANGES

When the proposed FAR ratio is considered in hand with the actual site layout (including the Vinegar Yard) and the intended public space improvements are accounted for (not 15% of Site Area as stated but in fact 1000sqm according to the evidence bases, the unspecified taller buildings encouraged to the west of the site will inevitably be very tall and by causing visual obstruction overshadowing and wind tunnelling etc. cause significant damage to the sensitive and valuable local heritage setting of the Horseshoe Pub, the Vinegar Warehouse and the Grade II listed Railway Arches. The wording of the site allocation text as it stands should be amended to remove the ambiguity that allows for the demolition of actual buildings / fabric like the Vinegar Yard Warehouse for example which despite being listed on 'placemarks', is only afforded protection by the phrase "development proposals should seek to retain and enhance where possible the townscape setting provided by key heritage assets.." Rather the guidance should be to the effect that the key buildings be retained and their settings enhanced.

Area Vision

AV10

Site Allocations

NSP52 and NSP53

Not Justified (robust evidence)

Not Positively Prepared or effective (no clear links and not monitorable )

#### DETAIL / PROPOSED CHANGES

Similarly the damaging imposition of high-rise development should be

mitigated by simply stating a clear height limit. This could be an actual height (as per the London Plan) or at least in the form of a guide that tall buildings should be in line with Becket House to the West and No. 40 Bermondsey Street to the East.

evidence are not convincing. 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, alternative options have not been properly explored and it is internally inconsistent.

#### DETAIL / PROPOSED CHANGES

These policies have been too vague, contradictory and error strewn during their evolution through to their present state to allow for any meaningful consultation to have taken place. The Old Bermondsey Neighbourhood Forum have tracked the evolution of the policies should further detail be required by the inspector. To summarise: From the Preferred Options consultation (ending in July 2017) through the Cabinet (31 Oct) and Council Assembly versions (29 Nov) to the present Submitted Version, the presentation of the site allocations has been effectively cloaking the high rise development that it arguably seeks to make permissible. Loose language on (the relationship between) tall buildings and local character, combined with the back grounding of key assumptions behind the notional scheme (that it has now become clear was being discussed with prospective developers in April 2017 if not earlier) went hand in hand with inherent contradictions stemming presumably from a deficient understanding of the site due to insufficient analysis, making the policies variously incomprehensible. An example of the many gross errors (at various stages of the evolution of these policies would be the version for Cabinet (31 Oct) having failed to adjust existing capacity figures / text in line with a fundamental change to the site area where the top of Bermondsey Street had been removed from the NSP53 allocation. An example of a continued ambiguity is the treatment of Vinegar Yard itself which has been variously deleted and mislabelled throughout and is now seemingly included in the site area when its is (verbal confirmation

from the council) not actually available for development.

The vagueness and contradiction around the proposed tall buildings and how they could integrate in the setting was cause of significant concerns articulated by the local community during the consultation window in July.

The negative effects of taller buildings on the character and sustainable future of the area was voiced clearly and in detail by 130 respondents to questionnaires circulated by the OBF alongside 200 letters of informed local opinion objecting to the terms of the site allocations. These were over-summarised in the consultation report and mostly “dealt with” in a single reference to borough wide policy.

It should be noted that 90% of people engaged in the questionnaires with had not previously been made aware (by the council) of these site allocation policies.

#### Site Allocations

NSP52 and NSP53

Not consistent with the NPPF:

Failure to comply with the NPPF paras 155 (engagement) and 157 (various) During this time (and indeed much prior to it i) the Forum have sought the council’s engagement in a community and heritage led brief for NSP52 and 53 but invitations to such the Site Brief Workshops from July through October were variously declined by the planning department. These were invitations also for the department to come and explain the incoherent site allocations policies to the community. These refusals to engage have gone hand in hand with refusals to provide details of advice that has been given to prospective developers on the site behind closed doors. While the council have (by virtue of no little effort on behalf of the Forum) been forced (FOIA 867131) to an actual

admission of one such set of meetings - on 29th November (coincidentally the same day that the present version of the NSP was passed at Council Assembly without any debate [after the guillotine] and without deputations being heard [attending but refused] on the subjects of Tall Buildings and St Thomas Street) - no details whatsoever have been given of the discussions

themselves and moreover no previous meetings or communications have been disclosed despite the clear terms of an FOIA requesting them - informed by the council's own previous admission that such meetings had taken place. Proper detailed community consultation should be undertaken on these Site Allocations. In the meantime the council's private plans and communications with prospective developers to date must be given proper public scrutiny.

Site Allocations NSP52 and NSP53 and by inference ALL Site Allocations (since all rely on the Methodology Evidence Base)

Not Justified: The plan is not founded on robust and credible evidence bases / the sources of evidence are not convincing. There is not a clear cut audit trail of how and why the preferred approach was arrived at. Alternative options have not been properly explored. There is no actual evidence (work described as having been undertaken in the Site Allocations Methodology paper) of detailed/iterative site analysis in relation to site capacity and similarly no evidence of proper investigations having been made into the potential effects on character and local heritage. To this end the attached letter of (21st January) - which has not been answered - asks for examples of working processes equating to Para. 3.11 (site capacity) and 3.2 (character, non-designated assets etc.). It then asks for evidence of how 3 key parts of the Integrated Impact Assessment (Historic England Good Practice Advice Note on P81 and IIAs 11 and 12 have been applied to the site allocations when in combination with the consultation received to date they would surely call into question the way tall buildings are still dominating the policies.

Site Allocations  
NSP52 and NSP53

DETAIL / PROPOSED CHANGES

More evidence should be gathered / made clear on how these sites are to be sensitively and sustainably developed using appropriate methods (currently lacking). There is no reason to assume that the failure to undertake the

processes outlined in the methodology background paper are limited to NSP52&53 and the requirement for new evidence (to then be properly consulted on) therefore implicates ALL the site allocation policies - not just those whose sites -like NSP53 - constitute incredibly valuable and sensitive local heritage contexts but also those where for example the local economic and cultural uses and values have not been sufficiently if at all understood.

#### Site Allocations

NSP52 and NSP53 and by inference ALL Site Allocations (since all rely on the the Methodology Evidence Base)

Not Effective

Not Positively Prepared

Not Justified

Incapable of being monitored because the sites are not sufficiently well understood, leading to inevitable gaps/inconsistencies (not positively prepared) in terms of how the spaces and uses (informal / cultural / economic) and the local character of the sites (can) contribute to the environmental economic and social sustainability of their wider settings. Consequently the aims of the Area Visions are not achievable and along with the Site Allocations are not justified.

#### DETAIL / PROPOSED CHANGES

In addition to the aforementioned non-credible evidence base (the site analysis described in the methodology) there is no Local List policy in the NSP. In addition to these deficiencies there a severe gap in the evidence base that supports the Strong Local Economy policies. These deficiencies compound to constitute a severe failure in understanding the relationship between the functioning of the local economy and the role of the existing built fabric as it is currently occupied. There has been no study to link these subjects arising from the Impact Assessment. In terms of character alone the Characterisation Studies for Bermondsey are out of date. Despite this they have been used (erroneously) to mis-define the boundary of the OBF Neighbourhood Area. Neighbourhood plans (with polices like Site Briefs for example) are a tool which could inform or indeed replace the Site Allocation

policies in some areas (deficient as they are in credible evidence / processes to support them): Local knowledge and understanding of use and (potential) cultural value of sites should be being drawn out and tied into the Area Visions. Both within and aside from (emerging) NPs, an audit of the local economy (in each Area Vision for example) combined with a Local List initiative could go some way to addressing this severe deficiency in the NSP's effective understanding of its subject.

#### Site Allocation

NSP53 Not Effective (not achievable)

Not Positively Prepared (inconsistencies)

Because the internal inconsistency between the taller buildings, the site development capacity and the "enhancement" of the heritage setting means the policies are not achievable. Similarly the Site Allocations are at odds with the London Bridge Area Vision (AV 10) which states that development should: Support the creation of... restored and reactivated warehouses and other heritage revealed with 'placemarks', - Build on the fabric of local alleyways and yards to create quiet, green routes.. - Support the development of vibrant new high streets on St Thomas Street, Crucifix Lane and Tooley Street, complementing the distinct character of nearby Bermondsey Street.

#### DETAIL / PROPOSED CHANGES

Similarly the damaging imposition of high-rise development should be mitigated by simply stating a clear height limit. This could be an actual height (as per the London Plan) or at least in the form of a guide that tall buildings should be in line with Becket House to the West and No. 40 Bermondsey Street to the East.

26. The London Bridge Plan identifies the opportunity for a step change in the quality of development along the southern side of London Bridge Station through the creation of the St Thomas Street Boulevard. This will require a strong urban design framework, an integrated approach to its development and a shared space approach to the street.

27. We believe delivery of the Boulevard requires a more unifying approach than is evident in the three separate site allocations that run along St Thomas Street. Sites NSP 51, 52 and 53 form a contiguous allocation along the southern edge of St Thomas Street and so share common characteristics. We believe there would be significant advantages in combining NSP 52 and NSP 53 into a single allocation with its future development guided by a coherent masterplan.

28. The site allocations for NSP 51, 52 and 53 would be strengthened by:

- Recognising their individual and collective contribution to the development of St Thomas Street as a high street, including part pedestrianisation and support for town centre uses and active frontages at ground level (and also potentially above ground floor) and set back from the St Thomas Street frontage
- Supporting the need for a mix of floorplate sizes to encourage retail and office diversity
- Avoiding a single, monolithic elevation along St Thomas Street
- Acknowledging the need for future development to respect the food, culture and retail offer in Bermondsey Street and the station
- Addressing the future impact of development on the microclimate and shading and requiring development to mitigate the impact of development on wind speeds along St Thomas Street and adjacent areas
- Establishing a stronger expectation for retaining and enhancing the townscape and undesignated heritage assets
- Increasing permeability and delivering an overall increase in public open space

Representation noted.

NSP 51, NSP52 and NSP53 are identified separate sites to identify the separate uses of the individual sites. Therefore it assumes a mix of uses could be provided, requiring the re-provision of employment uses in line with other policies in the CAZ and housing requirements. This includes NSP51 which intends to protect the existing land use although the site may also provide town centre uses. The site vision diagram also includes improved connectivity to St Thomas Street. Both NSP 52 and NPS 53 include direct reference to enhancing St Thomas Street.

The NSP is intended to be a strategic document so prescriptive design guidance is not included in the site allocations to allow for flexibility in design. As the NSP is intended to be read as a whole, the design policies relating to the protection of local cultural and heritage assets will need to be adhered to for any development that is brought forward. Any proposals for tall buildings will be assessed against these policies and other relevant policies in the development plan.

The sites methodology paper outlines the methods used to assess the potential capacities of the sites. All of these capacities are indicative and not prescriptive. The site capacities were reached with different officers making different assumptions about the site. A detailed design proposal would need to be put forward to have a definite site capacity but as the NSP is a strategic document indicative capacities are used only. For this reason, the site requirements act as a guide for development are not a site brief.

The area vision outlines the overall vision for the area, while the sites outline the requirements for specific areas to achieve the overall vision. Therefore, the aims of the area visions can be achieved through the combination of the

<ul style="list-style-type: none"> <li>• Supporting the need for sustainable drainage given the area is a critical drainage zone</li> </ul> <p>Recommendation</p> <ul style="list-style-type: none"> <li>• Amend site allocations NSP 51, 52 and 53 to secure a more integrated approach to the development of the St Thomas Street Boulevard.</li> </ul>	<p>site allocations within the area vision.</p> <p>A local list policy was added to the Amended Version of the plan in January 2019.</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: Thames Water Utilities Ltd NSPPSV184.66</p> <p>The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered.</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>	<p>Noted. Notwithstanding the above, applicants will still be notified to consult with Thames Water.</p>

Individual  
NSPPSV193.6

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 Areas, eroding their settings, views and compromising the historic character and distinctiveness.

Detail/ Proposed Changes.

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 plan is not founded on robust and credible evidence bases / the sources of evidence are not convincing. 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, alternative options have not been properly explored and it is internally inconsistent

Detail/ Proposed Changes.

These policies have been too vague, contradictory and error strewn during their evolution through to their present state to allow for any meaningful consultation to have taken place. The Old Bermondsey Neighbourhood Forum have tracked the evolution of the policies should further detail be required by the inspector. To summarise: From the Preferred Options consultation (ending in July 2017) through the Cabinet (31 Oct) and Council

Representation is noted. All developments are assessed on a case by case basis and those in a conservation area will have to adhere to policies regarding the design and context of the area as well as enhancing cultural and heritage assets.

Policies have been through rigorous amendments with the support of input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF & London Plan. The evidence base will be made public alongside the final submission of the NSP.

Consultation was held at several stages in the process and has helped strengthen NSP policies. Southwark Council's SCI is currently in the process of being updated and any form of feedback received has been acknowledged and responded to, with all responses being uploaded online. The consultation report will outline what consultation events were held with the community.

The NSP is intended to be a strategic document so prescriptive design guidance is not included in the site allocations to allow for flexibility in design. As the NSP is intended to be read as a whole, the design policies relating to the protection of local cultural and heritage assets will need to be adhered to for any development that is brought forward. Any proposals for tall buildings will be assessed against these policies and other relevant policies in the development plan.

The sites methodology paper outlines the methods used to assess the potential capacities of the sites. All of these capacities are indicative and not prescriptive. The site capacities were reached with different officers making different assumptions about the site. A detailed design proposal would need

Assembly versions (29 Nov) to the present Submitted Version, the presentation of the site allocations has been effectively cloaking the high rise development that it arguably seeks to make permissible. Loose language on (the relationship between) tall buildings and local character, combined with the back grounding of key assumptions behind the notional scheme (that it has now become clear was being discussed with prospective developers in April 2017 if not earlier) went hand in hand with inherent contradictions stemming presumably from a deficient understanding of the site due to insufficient analysis, making the policies variously incomprehensible. An example of the many gross errors (at various stages of the evolution of these policies would be the version for Cabinet (31 Oct) having failed to adjust existing capacity figures / text in line with a fundamental change to the site area where the top of Bermondsey Street had been removed from the NSP53 allocation.

An example of a continued ambiguity is the treatment of Vinegar Yard itself which has been variously deleted and mislabelled throughout and is now seemingly included in the site area when its is (verbal confirmation from the council) not actually available for development.

The vagueness and contradiction around the proposed tall buildings and how they could integrate in the setting was cause of significant concerns articulated by the local community during the consultation window in July. The negative effects of taller buildings on the character and sustainable future of the area was voiced clearly and in detail by 130 respondents to questionnaires circulated by the OBF alongside 200 letters of informed local opinion objecting to the terms of the site allocations. These were over-summarised in the consultation report and mostly “dealt with” in a single reference to borough wide policy. It should be noted that 90% of people engaged in the questionnaires with had not previously been made aware (by the council) of these site allocation policies.

Not consistent with the NPPF:

to be put forward to have a definite site capacity but as the NSP is a strategic document indicative capacities are used only. For this reason, the site requirements act as a guide for development and is not a site brief.

The area vision outlines the overall vision for the area, while the sites outline the requirements for specific areas to achieve the overall vision. Therefore, the aims of the area visions can be achieved through the combination of the site allocations within the area vision.

A local list policy was added to the Amended Version of the plan in January 2019.

Organisation: Team London Bridge  
NSPPSV179.11

26. The London Bridge Plan identifies the opportunity for a step change in the quality of development along the southern side of London Bridge Station through the creation of the St Thomas Street Boulevard. This will require a strong urban design framework, an integrated approach to its development and a shared space approach to the street.

27. We believe delivery of the Boulevard requires a more unifying approach than is evident in the three separate site allocations that run along St Thomas Street. Sites NSP 51, 52 and 53 form a contiguous allocation along the southern edge of St Thomas Street and so share common characteristics. We believe there would be significant advantages in combining NSP 52 and NSP 53 into a single allocation with its future development guided by a coherent masterplan.

28. The site allocations for NSP 51, 52 and 53 would be strengthened by:

- Recognising their individual and collective contribution to the development of St Thomas Street as a high street, including part pedestrianisation and support for town centre uses and active frontages at ground level (and also potentially above ground floor) and set back from the St Thomas Street frontage

Failure to comply with the NPPF paras 155(engagement) and 157 (various):

Detail/ Proposed Changes.

During this time (and indeed much prior to it) the Forum have sought the council's engagement in a community and heritage led brief for NSP52 and 53 but invitations to such the Site Brief Workshops from July through October were variously declined by the planning department. These were invitations also for the department to come and explain the incoherent site allocations policies to the community. These refusals to engage have gone hand in hand with refusals to provide details of advice that has been given to prospective developers on the site behind closed doors. While the council have (by virtue

of no little effort on behalf of the Forum) been forced (FOIA 867131) to an actual admission of one such set of meetings - on 29th November (coincidentally the same day that the present version of the NSP was passed at Council Assembly without any debate [after the guillotine] and without deputations being heard [attending but refused] on the subjects of Tall Buildings and St Thomas Street) - no details whatsoever have been given of the discussions themselves and moreover no previous meetings or communications have been disclosed despite the clear terms of an FOIA requesting them - informed by the council's own previous admission that such meetings had taken place. Proper detailed community consultation should be undertaken on these Site Allocations. In the meantime the council's private plans and communications with prospective developers to date must be given proper public scrutiny.

Not Justified: The plan is not founded on robust and credible evidence bases / the sources of evidence are not convincing. There is not a clear cut audit trail of how and why the preferred approach was arrived at. Alternative options have not been properly explored.

Detail/ Proposed Changes

- Supporting the need for a mix of floorplate sizes to encourage retail and office diversity
- Avoiding a single, monolithic elevation along St Thomas Street
- Acknowledging the need for future development to respect the food, culture and retail offer in Bermondsey Street and the station
- Addressing the future impact of development on the microclimate and shading and requiring development to mitigate the impact of development on wind speeds along St Thomas Street and adjacent areas
- Establishing a stronger expectation for retaining and enhancing the townscape and undesignated heritage assets
- Increasing permeability and delivering an overall increase in public open space
- Supporting the need for sustainable drainage given the area is a critical drainage zone

Recommendation

- Amend site allocations NSP 51, 52 and 53 to secure a more integrated approach to the development of the St Thomas Street Boulevard.

There is no actual evidence (work described as having been undertaken in the Site Allocations Methodology paper) of detailed/iterative site analysis in relation to site capacity and similarly no evidence of proper investigations having been made into the potential effects on character and local heritage. To this end the attached letter of (21st January) - which has not been answered - asks for examples of working processes equating to Para. 3.11 (site capacity) and 3.2 (character, non-designated assets etc.). It then asks for evidence of how 3 key parts of the Integrated Impact Assessment (Historic England Good Practice Advice Note on P81 and IIAs 11 and 12 have been applied to the site allocations when in combination with the consultation received to date they would surely call into question the way tall buildings are still dominating the policies.

More evidence should be gathered / made clear on how these sites are to be sensitively and sustainably developed using appropriate methods (currently lacking). There is no reason to assume that the failure to undertake the processes outlined in the methodology background paper are limited to NSP52&53 and the requirement for new evidence (to then be properly consulted on) therefore implicates ALL the site allocation policies - not just those whose sites -like NSP53 - constitute incredibly valuable and sensitive local heritage contexts but also those where for example the local economic and cultural uses and values have not been sufficiently if at all understood. Because the internal inconsistency between the taller buildings, the site development capacity and the “enhancement” of the heritage setting means the policies are not achievable. Similarly the Site Allocations are at odds with the London

Bridge Area Vision (AV 10) which states that development should:

- Support the creation of... restored and reactivated warehouses and other heritage revealed with ‘placemarks’,
- Build on the fabric of local alleyways and yards to create quiet, green routes..
- Support the development of vibrant new high streets on St Thomas Street,

Crucifix Lane and Tooley Street, complementing the distinct character of nearby Bermondsey Street.

Detail/ Proposed Changes.

When the proposed FAR ratio is considered in hand with the actual site layout (including the Vinegar Yard) and the intended public space improvements are accounted for (not 15% of Site Area as stated but in fact 1000sqm according to the evidence bases, the unspecified taller buildings encouraged to the west of the site will inevitably be very tall and by causing visual obstruction overshadowing and wind tunnelling etc. cause significant damage to the sensitive and valuable local heritage setting of the Horseshoe Pub, the Vinegar Warehouse and the Grade II listed Railway Arches. The wording of the site allocation text as it stands should be amended to remove the ambiguity that allows for the demolition of actual buildings / fabric like the Vinegar Yard Warehouse for example which despite being listed on 'placemarks', is only afforded protection by the phrase "development proposals should seek to retain and enhance where possible the townscape setting provided by key heritage assets.."

Rather the guidance should be to the effect that the key buildings be retained and their settings enhanced. Similarly the damaging imposition of high-rise development should be mitigated by simply stating a clear height limit. This could be an actual height (as per the London Plan) or at least in the form of a guide that tall buildings should be in line with Becket House to the West and No. 40 Bermondsey Street to the East. A letter to this effect - which has also been left answered - is attached (17th January) giving more detail on the proposed changes to the site allocation text.

Organisation: Old Bermondsey Forum  
NSPPSV297.1

Do you consider the document to be legally compliant in accordance with

Representation is noted.

the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? Legally compliant

No

Do you consider that the New Southwark Plan is sound? - Soundness

No

Do you consider that the New Southwark Plan is unsound because it is not: Justified

Do you consider that the New Southwark Plan is unsound because it is not: Effective

Do you consider that the New Southwark Plan is unsound because it is not: Consistent with national policy and the London Plan

Do you consider that the New Southwark Plan is unsound because it is not: Positively Prepared

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.

The site allocation has not been consulted upon because it was written only after a derisory consultation process took place. In so far as a derisory consultation on a policy that did not then exist in any intelligible form did take place the results were disregarded without any apparent reason. The site allocation is internally inconsistent in that the stated requirements for development of the site are incompatible. In particular, the treatment of the heritage assets on the site is incompatible with the density stipulations and/or the expected use of the remainder of the site.

The NSP aims to deliver a document of implementation and strategic policies that sets guidance on major development for new homes, social, green and transport infrastructure based upon the issues and objectives identified in the IIA.

Policies have been through rigorous amendments with the support of input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF & London Plan. Consultation was held at several stages in the process and has helped strengthen NSP policies. Southwark Council's SCI is currently in the process of being updated and any form of feedback received has been acknowledged and responded to, with all responses being uploaded online. The consultation report will outline what consultation events were held with the community.

With regards to evidence and reasoning behind policies e.g. residential, all supporting evidence base can be viewed online. All evidence base will be made public alongside the final submission of the NSP. The NSP will be revised taking on comments given to ensure that policies and all area visions with design guidance will be strengthened. This particularly applies to the site allocations that anticipate tall building developments to ensure that consideration is given to heritage assets and the context of local character.

The NSP is intended to be read a whole. It is considered that any development on the site allocation will adhere to the policies outlined in the rest of the NSP; this includes design policies that require the enhancement of local assets such as the Horseshoe Pub and Vinegar Yard. The site allocations are therefore not providing specific detailed requirements to allow for flexibility in design.

By identifying heritage assets to be preserved on the site it ceases to be capable of being treated as a single 'site' at all. Any cogent site brief would need to redefine the site to exclude the heritage assets. The existence of the public thoroughfare of Vinegar Yard is fudged as though it can be ignored. All these defects arise because there has been no clear analysis of what building could reasonably be achieved on the site having regard to its setting and surrounding and included heritage assets and conservation area. That there has been no such analysis is evident as the Council have refused our countless calls to articulate their methodology.

The site allocation is silent on the locations it suggests are appropriate for tall buildings or the heights it proposes. This is contrary to the requirements of the London Plan.

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.

There needs to be genuine and effective consultation.

The site needs to be redefined to exclude the heritage assets and the brief needs to be definitive about these being preserved and their setting enhanced.

There needs to be proper consideration of what use, density and mass of development is suitable to interpose between the listed arches on St Thomas St and the unlisted heritage assets, the Vinegar Yard warehouse and the Horseshoe pub to the south.

If justified at all, the locations and maximum heights of any 'Tall buildings' need to be specified in compliance with the London Plan.

Finally, there needs to be a local consultation clear and fully reasoned site brief.

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

Do you consider that the New Southwark Plan is sound? - Soundness  
No

Do you consider that the New Southwark Plan is unsound because it is not:  
Justified

Do you consider that the New Southwark Plan is unsound because it is not:  
Effective

Do you consider that the New Southwark Plan is unsound because it is not:  
Consistent with national policy and the London Plan

Do you consider that the New Southwark Plan is unsound because it is not:  
Positively Prepared

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.

NSP 53 has not been genuinely consulted upon. The only 'consultation' that the Council engaged in was in relation to a version that was ill-conceived, obsolete, inadequately explained and failed give any coherent account of what it is intended to authorise by way of development.

Representation is noted.

Policies have been through rigorous amendments with the support of input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF & London Plan. All evidence base will be made public alongside the final submission of the NSP.

Consultation was held at several stages in the process and has helped strengthen NSP policies. Southwark Council's SCI is currently in the process of being updated and any form of feedback received has been acknowledged and responded to, with all responses being uploaded online. The consultation report will outline what consultation events were held with the community.

Any proposal for tall buildings will be assessed on a case by case basis and will have to adhere to P14 which sets out that the requirements of tall buildings to proportionate to its context and to respond positively to the character of the local area. The detail of heights of tall buildings shall not be covered in the NSP as it is a strategic policy document, but where tall buildings are suggested on site allocations the associated area visions AAP or SPD will provide more details.

Any residential proposals on the site will have to adhere to policies in the development plan relating to housing which includes requirements for affordable housing. Housing may be provided here, although employment use will be prioritised as it is located in the CAZ.

The sites methodology paper outlines the methods used to assess the

The site brief presents itself as endorsing 'tall buildings' but there is no indication as to how such buildings could be incorporated on the site, nor any indication of acceptable heights, contrary to the London Plan. Neither is there any explanation of how tall buildings represent considered development potential where the site is interposed between the listed St Thomas St viaduct arches and the acknowledged unlisted heritage assets of the Horseshoe pub and the Vinegar Yard warehouse, as well as the Bermondsey St conservation area, to the south.

The site brief relates to a site which does not exist as a distinct site, either as to ownership or coherence. It takes in the Vinegar Yard warehouse and other parts of the conservation area. If, as the Council have told us( verbally only), the site brief is intended to be clear that the warehouse is to be preserved then (a) it should say so in terms, and (2) it should be amended to remove the warehouse from the site plan as the land it occupies is not available for new development in any case. Consequently, the proposed development area and proposed uses are unintelligible and unachievable whilst meeting other stipulations in the brief. i.e. It is internally inconsistent.

Further, the site is shown to include the public thoroughfare of Vinegar Yard. On the other hand, the Council have confirmed to us (again only verbally) that they have no intention of handing over Vinegar Yard to a developer. This should be explicit and without such clarity the brief exhibits further unacceptable ambiguity. It also affects significantly the site area.

There is no reasoning or evidence to support the policy of introduction of residential development in this location, which is elsewhere argued by the Council to be exclusively suited to business or other non-residential uses. Certainly there is no consideration shown as to how residential development in this location could contribute to housing other than at the very top end of the price spectrum, alien to local people and contributing nothing to the stock of affordable housing.

potential capacities of the sites. All of these capacities are indicative and not prescriptive. The site capacities were reached with different officers making different assumptions about the site. A detailed design proposal would need to be put forward to have a definite site capacity but as the NSP is a strategic document indicative capacities are used only.

The reason that the site brief is unintelligible is clear: There has been no properly considered assessment of the site and its capacity for development or the relationship between feasible density, building heights and the insufficiently particularised, but nevertheless acknowledged, constraints presented by immediate heritage assets and conservation and townscape considerations. The Council have been called upon repeatedly to give a coherent methodology for their arrival at the terms of the site allocation but they have consistently refused to do so. In practice, the only basis for the site allocation as it stands is compliance with demands from developers in disregard of local consultations carried out by OBVNF.

Individual  
NSPPSV303.4

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

Do you consider that the New Southwark Plan is sound? - Soundness

No

Do you consider that the New Southwark Plan is unsound because it is not: Justified

Do you consider that the New Southwark Plan is unsound because it is not: Effective

Do you consider that the New Southwark Plan is unsound because it is not: Consistent with national policy and the London Plan

Do you consider that the New Southwark Plan is unsound because it is not: Positively Prepared

Representation is noted.

The detail of heights of tall buildings shall not be covered in the NSP as it is a strategic policy document, but where tall buildings are suggested on site allocations the associated area visions AAP or SPD will provide more details.

The sites methodology paper outlines the methods used to assess the potential capacities of the sites. All of these capacities are indicative and not prescriptive. The site capacities were reached with different officers making different assumptions about the site. A detailed design proposal would need to be put forward to have a definite site capacity but as the NSP is a strategic document indicative capacities are used only. These are not guides for granting planning permissions. Planning applications are assessed on a case by case basis against the policies in the development plan.

The issue of property developers paying tax is not a planning issue and so cannot be covered within the NSP.

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.

Area NSP53 originally (in NSP drafts) contained indicative capacities. These  
were based on firstly assumptions of average coverage of 35% area and  
average height of 14 storeys and a maximum of 50% residential. The average  
height later revised downwards to 8 storeys.

However interested property developers objected to these capacity numbers  
- and are know to be looking for heights of up to 60 storeys - and residential  
capacity of up to 95%. The council has therefore conveniently dropped all  
capacity numbers and height indications - saying the numbers have been  
moved to the background papers. In reality the capacity numbers have been  
dropped altogether - with the Council paving the way for high rise residential  
development - on both NSP53 and NSP52. This in direct conflict with the  
known expressed wishes of the local community.

And lastly, in the process of gradually granting high rise planning permissions  
on both NSP52 (the Quill) and NSP53 - various property developers have  
bought and sold plots within those Areas and taken vast capital gains, all  
recorded offshore , so that no tax is payable. This I find morally offensive and  
should not be accommodated. No property owned by an offshore trust  
should be granted any planning permission by Southwark whatsoever - until  
ownership is brought onshore and into UK jurisdiction.

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.

Re-insert the indicative capacity numbers for NSP53 & NSP52 - and indicative maximum heights. And then stick to it when applications are made.

On NSP52 - where the background paper capacity numbers state and average height of 16 storeys- The Quill site occupying half of NSP52 - was granted planning permission at 31 storeys - and is now being reapplied for at 45 storeys - and as 95% residential (under the limited guise of student accomodation).

Make sure that the property developer owners pay UK tax on any gains from increases in value due to planning permission granted by Southwark.

#### Individuals

NSPPSV306.4

NSPPSV310.4

NSPPSV312.4

NSPPSV313.4

NSPPSV314.4

NSPPSV315.4

NSPPSV326.4

NSPPSV328.4

NSPPSV329.4

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.

NSP 53 has not been genuinely consulted upon. The only consultation that

Representations are noted.

Policies have been through rigorous amendments with the support of input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF & London Plan. All evidence base will be made public alongside the final submission of the NSP.

the Council engaged in was in relation to a version that was obsolete, inadequately explained and failed give any coherent account of what it is intended to endorse by way of development.

The site brief presents itself as authorising 'tall buildings' but there is no indication as to how or such buildings could be incorporated on the site, nor any indication of acceptable heights, contrary to the London Plan. Neither is there any explanation of how tall buildings represent considered development potential where the site is interspersed between the listed St Thomas St viaduct arches and the acknowledged unlisted heritage assets of the Horseshoe pub and the Vinegar Yard warehouse, as well as the Bermondsey St conservation area, to the south.

The site brief relates to a site which does not exist as a distinct site, either as to ownership or coherence. It takes in the Vinegar Yard warehouse and other parts of the conservation area. If, as the Council have stated (verbally only) that the site brief is intended to be clear that the warehouse is to be preserved then (a) it should say so in the terms of the plan and (2) it should be amended to remove the warehouse from the site plan as the land it occupies is not available for new development in any case. Consequently, the proposed development area and proposed uses are unintelligible and not achievable whilst meeting other stipulations in the brief. That is to say, the proposal is internally inconsistent.

Further, the site is shown to include the public thoroughfare of Vinegar Yard. On the other hand, the Council has confirmed (again only verbally) that they have no intention of handing over Vinegar Yard to a developer. This should be explicit and without such clarity, the brief exhibits further unacceptable ambiguity. It also affects significantly the site area. There is no reasoning or evidence to support the policy of introduction of residential development in this location, which is elsewhere argued by the Council to be exclusively suited to business or other non-residential uses. Certainly there is no consideration shown as to how residential development in this location could

Consultation was held at several stages in the process and has helped strengthen NSP policies. Southwark Council's SCI is currently in the process of being updated and any form of feedback received has been acknowledged and responded to, with all responses being uploaded online. The consultation report will outline what consultation events were held with the community.

As it currently stands site allocations that have been designated to anticipate tall buildings have been strategically assessed through our Sites Methodology Paper. This methodology paper underpins all site allocations which then provides further guidance on the expectations for the site in regards to how development can integrate with the existing context.

Applications for tall buildings are assessed on a case by case basis against the policies in the development plan which includes policies on design and tall buildings. In addition to this site locations are being updated to clearly set out the sensitive constraints that each developer should pay regard to when developing the site. These sensitivities are reflective of factors that have been evaluated in the tall buildings background and research paper ensuring tall building development is correctly implemented. By identifying specific site allocations to anticipate tall building development ensures that there is a clear plan-led approach to constructing tall buildings, with the emerging tall buildings background and research paper also setting out factors that would consider a location acceptable or not for tall building development. The detail of heights however shall not be covered in the NSP as it is a strategic policy document, but rather in the AAP or SPD associated to the area vision of the site allocation.

Any residential proposals on the site will have to adhere to polices in the development plan relating to housing which includes requirements for affordable housing. Housing may be provided here, although employment use will be prioritised as it is located in the CAZ.

contribute to housing other than at the very top end of the price spectrum, alien to local people and contributing nothing to the stock of affordable housing.

The reason that the site brief is unintelligible is clear: There has been no properly considered assessment of the site and its capacity for development or the relationship between feasible density, building heights and the insufficiently particularized, but nevertheless acknowledged, constraints presented by immediate heritage assets and conservation and townscape considerations. The Council has been called upon repeatedly to give a coherent methodology for their arrival at the terms of the site allocation but have yet done so. It appears that the basis for the site allocation as it stands is one of compliance with demands from developers and in disregard of local consultations carried out by the OBVNF.

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.

[Duplicated text] All the defects listed above can be addressed by the Council by carrying out a full consultation and taking into account the results. There must be no ambiguity in the site brief, and specify about what is intended and on what evidence these decisions are based. There should be clear statements on what is to be preserved of the affected heritage assets; that Vinegar Yard is to remain a public road and, if the brief is to endorse tall buildings, specify their height limits and locations to which they are said to be suited. At the very least, there needs to be compliance with the London Plan by identifying any locations where high-rise will be considered and specifications as to the maximum heights which may be acceptable.

The sites methodology paper outlines the methods used to assess the potential capacities of the sites. All of these capacities are indicative and not prescriptive. The site capacities were reached with different officers making different assumptions about the site. A detailed design proposal would need to be put forward to have a definite site capacity but as the NSP is a strategic document indicative capacities are used only. For this reason, the site requirements act as a guide for development and are not a site brief.

Individual  
NSPPSV311.4

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.

NSP 53 has not been genuinely consulted upon. The site brief presents itself as authorising 'tall buildings' but there is no indication as to how or such buildings could be incorporated on the site, nor any indication of acceptable heights, contrary to the London Plan.

Further, there is no reasoning or evidence to support the policy of introduction of residential development in this location, which is elsewhere argued by the Council to be exclusively suited to business or other non-residential uses. Certainly there is no consideration shown as to how residential development in this location could contribute to housing other than at the very top end of the price spectrum, alien to local people and contributing nothing to the stock of affordable housing.

The reason that the site brief is unintelligible is clear: There has been no properly considered assessment of the site and its capacity for development or the relationship between feasible density, building heights and the insufficiently particularised, but nevertheless acknowledged, constraints presented by immediate heritage assets and conservation and townscape considerations.

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.

Representation is noted.

Consultation was held at several stages in the process and has helped strengthen NSP policies. Southwark Council's SCI is currently in the process of being updated and any form of feedback received has been acknowledged and responded to, with all responses being uploaded online. The consultation report will outline what consultation events were held with the community.

The detail of heights of tall buildings shall not be covered in the NSP as it is a strategic policy document, but where tall buildings are suggested on site allocations the associated area visions AAP or SPD will provide more details.

Any residential proposals on the site will have to adhere to policies in the development plan relating to housing which includes requirements for affordable housing. Housing may be provided here, although employment use will be prioritised as it is located in the CAZ.

The sites methodology paper outlines the methods used to assess the potential capacities of the sites. All of these capacities are indicative and not prescriptive. The site capacities were reached with different officers making different assumptions about the site. A detailed design proposal would need to be put forward to have a definite site capacity but as the NSP is a strategic document indicative capacities are used only. For this reason, the site requirements act as a guide for development and is not a site brief.

All the defects listed above can be addressed by the Council carrying out proper consultation and not ignoring the results.  
Comply with the London Plan by identifying any locations where high-rise will be considered and specify the maximum heights which may be acceptable.

Organisation: Planning Resolution  
NSPPSV320.1

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.

The 'Site Vision diagram' indicates that my client's site, The Horseshoe Pub, would be specifically carved out from the proposals that would allow for comprehensive redevelopment of the area contained within the NSP53 boundary.

The 'design and accessibility guidance' section states that any development proposals within this site vision boundary would need to enhance the setting of the unlisted Horseshoe Pub and unlisted Leather Warehouse buildings.

We consider that by carving out the Horseshoe Pub site from the Site Vision for the NSP53 site, with a fussy and protracted site boundary, the development aspirations of my client to enhance the Horseshoe Pub site will be unduly restricted. We consider that the Horseshoe Pub site has development potential to contribute towards the site vision for optimising development and enhancing the townscape on Vinegar Yard.

Any acceptable redevelopment of this site can be achieved through development management policies of the New Southwark Plan. Any proposed redevelopment of NSP53 would need to consider the Horseshoe Pub and enhance its setting as an undesignated heritage asset.

Furthermore, the ability for new development on adjacent sites (within the NSP53 site boundary) to positively respond to the setting of the Horseshoe Pub will be compromised, resulting in a sub-optimal, piecemeal development. The identified policy aspiration for taller buildings on the western edge of the site would be less compromised if the protracted site boundary was revised to include the Horseshoe Pub.

The fragmented site boundary on the western edge of the NSP53 site risks stymieing a comprehensive and optimised redevelopment – potentially resulting in greater harm to the setting of the Horseshoe Pub.

The exclusion of the Horseshoe Pub from this Area Vision will also stymie opportunities for improved connectivity for pedestrians and cyclists between Melior Street/Place and St.Thomas Street.

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.

My client seeks that the Horseshoe Pub site is subsumed within the site boundary of the NSP53 Site Vision area.

Reason:

The 'Site Vision diagram' indicates that my client's site, The Horseshoe Pub, would be specifically carved out from the proposals that would allow for comprehensive redevelopment of the area contained within the NSP53 boundary.

The 'design and accessibility guidance' section states that any development

proposals within this site vision boundary would need to enhance the setting of the unlisted Horseshoe Pub and unlisted Leather Warehouse buildings.

Individual  
NSPPSV322.4

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."

There is no clarity given on the appropriate height in this Conservation Area but the Conservation Area Character Statement gives 8 storeys as the clear norm. The Local Plan should conform or explain.

The Plan needs to state clearly that in a Conservation Area and in the setting of a Conservation Area what the council considers to be the maximum height of building that is acceptable, and support this statement, together with a with clear policy with design criteria to be applied to any prospective development to test and confirm or negate compliance.

Representation is noted.

The detail of heights of tall buildings shall not be covered in the NSP as it is a strategic policy document, but where tall buildings are suggested on site allocations the associated area visions AAP or SPD will provide more details. In addition to this site locations are being updated to clearly set out the sensitive constraints that each developer should pay regard to when developing the site. These sensitivities are reflective of factors that have been evaluated in the tall buildings background and research paper ensuring tall building development is correctly implemented. By identifying specific site allocations to anticipate tall building development ensures that there is a clear plan-led approach to constructing tall buildings, with the emerging tall buildings background and research paper also setting out factors that would consider a location acceptable or not for tall building development.

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.

Individual  
NSPPSV 326.3

NSP 53 has not been genuinely consulted upon. The only 'consultation' that the Council engaged in was in relation to a version that was ill-conceived, obsolete, inadequately explained and failed give any coherent account of what it is intended to endorse by way of development.

The site brief presents itself as authorising 'tall buildings' but there is no indication as to how or such buildings could be incorporated on the site, nor any indication of acceptable heights, contrary to the London Plan. Neither is there any explanation of how tall buildings represent considered development potential where the site is interspersed between the listed St Thomas St viaduct arches and the acknowledged unlisted heritage assets of

Representation is noted.

Consultation was held at several stages in the process and has helped strengthen NSP policies. Southwark Council's SCI is currently in the process of being updated and any form of feedback received has been acknowledged and responded to, with all responses being uploaded online. The consultation report will outline what consultation events were held with the community.

The detail of heights of tall buildings or their incorporation on site shall not be covered in the NSP as it is a strategic policy document, but where tall

the Horseshoe pub and the Vinegar Yard warehouse, as well as the Bermondsey St conservation area, to the south.

The site brief relates to a site which does not exist as a distinct site, either as to ownership or coherence. It takes in the Vinegar Yard warehouse and other parts of the conservation area. If, as the Council have told us (verbally only), the site brief is intended to be clear that the warehouse is to be preserved then (a) it should say so in terms, and (2) it should be amended to remove the warehouse from the site plan as the land it occupies is not available for new development in any case. Consequently, the proposed development area and proposed uses are unintelligible and unachievable whilst meeting other stipulations in the brief. i.e. It is internally inconsistent.

Further, the site is shown to include the public thoroughfare of Vinegar Yard. On the other hand, the Council has confirmed to us (again only verbally) that they have no intention of handing over Vinegar Yard to a developer. This should be explicit and without such clarity the brief exhibits further unacceptable ambiguity. It also affects significantly the site area. There is no reasoning or evidence to support the policy of introduction of residential development in this location, which is elsewhere argued by the Council to be exclusively suited to business or other non-residential uses. Certainly there is no consideration shown as to how residential development in this location could contribute to housing other than at the very top end of the price spectrum, alien to local people and contributing nothing to the stock of affordable housing.

The reason that the site brief is unintelligible is clear: There has been no properly considered assessment of the site and its capacity for development or the relationship between feasible density, building heights and the insufficiently particularised, but nevertheless acknowledged, constraints presented by immediate heritage assets and conservation and townscape considerations. The Council has been called upon repeatedly to give a coherent methodology for their arrival at the terms of the site allocation but

buildings are suggested on site allocations the associated area visions AAP or will provide more details.

As it currently stands site allocations that have been designated to anticipate tall buildings have been strategically assessed through our Sites Methodology Paper. This methodology paper underpins all site allocations which then provides further guidance on the expectations for the site in regards to how development can integrate with the existing context.

The sites methodology paper outlines the methods used to assess the potential capacities of the sites. All of these capacities are indicative and not prescriptive. The site capacities were reached with different officers making different assumptions about the site. A detailed design proposal would need to be put forward to have a definite site capacity but as the NSP is a strategic document indicative capacities are used only. For this reason, the site requirements act as a guide for development and is not a site brief.

they have consistently refused to do so. In practice, the only basis for the site allocation as it stands is compliance with demands from developers in disregard of local consultations carried out by OBVNF.

All the defects listed above can be addressed by the Council carrying out proper consultation and not ignoring the results. They must abandon the intentional ambiguity in the site brief and be specific about what is intended and the evidence on which it is based. There should be clear statements on what is to be preserved of the affected heritage assets, that Vinegar Yard is to remain a public road and, if the brief is to endorse tall buildings, specify their height limits and locations to which they are said to be suited.

The Council has not considered or consulted upon tall buildings policy. Instead it is operating a make-it-up-as-we-go-along strategy driven by aspirations to obtain money from developers.

This is not compliant with the London Plan, nor is it the product of any proper consideration or consultation. In particular, there is no specification of locations in which tall buildings will be acceptable, less still any reasons why. Consequently, there is also no specification of any maximum heights that may be acceptable where high-rise is.

Comply with the London Plan by identifying any locations where high-rise will be considered and specify the maximum heights which may be acceptable.

Individual  
NSPPSV328.3

NSP 53 has not been genuinely consulted upon. The only 'consultation' that the Council engaged in was in relation to a version that was ill-conceived, obsolete, inadequately explained and failed give any coherent account of what it is intended to endorse by way of development.

The site brief presents itself as authorising 'tall buildings' but there is no

Representation is noted.

Consultation was held at several stages in the process and has helped strengthen NSP policies. Southwark Council's SCI is currently in the process of being updated and any form of feedback received has been acknowledged and responded to, with all responses being uploaded online. The

indication as to how or such buildings could be incorporated on the site, nor any indication of acceptable heights, contrary to the London Plan. Neither is there any explanation of how tall buildings represent considered development potential where the site is interspersed between the listed St Thomas St viaduct arches and the acknowledged unlisted heritage assets of the Horseshoe pub and the Vinegar Yard warehouse, as well as the Bermondsey St conservation area, to the south.

The site brief relates to a site which does not exist as a distinct site, either as to ownership or coherence. It takes in the Vinegar Yard warehouse and other parts of the conservation area. If, as the Council have told us (verbally only), the site brief is intended to be clear that the warehouse is to be preserved then (a) it should say so in terms, and (2) it should be amended to remove the warehouse from the site plan as the land it occupies is not available for new development in any case. Consequently, the proposed development area and proposed uses are unintelligible and unachievable whilst meeting other stipulations in the brief. i.e. It is internally inconsistent.

Further, the site is shown to include the public thoroughfare of Vinegar Yard. On the other hand, the Council has confirmed to us (again only verbally) that they have no intention of handing over Vinegar Yard to a developer. This should be explicit and without such clarity the brief exhibits further unacceptable ambiguity. It also affects significantly the site area. There is no reasoning or evidence to support the policy of introduction of residential development in this location, which is elsewhere argued by the Council to be exclusively suited to business or other non-residential uses. Certainly there is no consideration shown as to how residential development in this location could contribute to housing other than at the very top end of the price spectrum, alien to local people and contributing nothing to the stock of affordable housing.

The reason that the site brief is unintelligible is clear: There has been no properly considered assessment of the site and its capacity for development

consultation report will outline what consultation events were held with the community.

The detail of heights of tall buildings or their incorporation on site shall not be covered in the NSP as it is a strategic policy document, but where tall buildings are suggested on site allocations the associated area visions AAP or will provide more details.

As it currently stands site allocations that have been designated to anticipate tall buildings have been strategically assessed through our Sites Methodology Paper. This methodology paper underpins all site allocations which then provides further guidance on the expectations for the site in regards to how development can integrate with the existing context.

The sites methodology paper outlines the methods used to assess the potential capacities of the sites. All of these capacities are indicative and not prescriptive. The site capacities were reached with different officers making different assumptions about the site. A detailed design proposal would need to be put forward to have a definite site capacity but as the NSP is a strategic document indicative capacities are used only. For this reason, the site requirements act as a guide for development are not a site brief.

or the relationship between feasible density, building heights and the insufficiently particularised, but nevertheless acknowledged, constraints presented by immediate heritage assets and conservation and townscape considerations. The Council has been called upon repeatedly to give a coherent methodology for their arrival at the terms of the site allocation but they have consistently refused to do so. In practice, the only basis for the site allocation as it stands is compliance with demands from developers in disregard of local consultations carried out by OBVNF.

All the defects listed above can be addressed by the Council carrying out proper consultation and not ignoring the results. They must abandon the intentional ambiguity in the site brief and be specific about what is intended and the evidence on which it is based. There should be clear statements on what is to be preserved of the affected heritage assets, that Vinegar Yard is to remain a public road and, if the brief is to endorse tall buildings, specify their height limits and locations to which they are said to be suited.

The Council has no considered or consulted-upon tall buildings policy. Instead it is operating a make-it-up-as-we-go-along strategy driven by aspirations to obtain money from developers.

This is not compliant with the London Plan, nor is it the product of any proper consideration or consultation. In particular, there is no specification of locations in which tall buildings will be acceptable, less still any reasons why. Consequently, there is also no specification of any maximum heights that may be acceptable where high-rise is.

Comply with the London Plan by identifying any locations where high-rise will be considered and specify the maximum heights which may be acceptable.

Representation	Officer Response
<p data-bbox="188 316 752 344">NSP54: Colechurch House, London Bridge Walk</p> <p data-bbox="188 355 685 419">Organisation: Thames Water Utilities Ltd NSPPSV184.23</p> <p data-bbox="188 464 1032 528">On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.</p> <p data-bbox="188 571 1070 671">On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>	<p data-bbox="1140 464 2056 528">Noted. Notwithstanding the above, applicants will still be notified to consult with Thames Water.</p>
<p data-bbox="188 719 353 783">Individual NSPPSV40.23</p> <p data-bbox="188 826 1088 927">The proposals for redevelopment of the following sites are not justified because the views of the local residents have not been fully considered and taken into account. I can expand on this at the oral examination.</p>	<p data-bbox="1140 826 2051 1072">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. Southwark Council's SCI is currently in the process of being updated and any form of feedback received has been acknowledged and responded to, with all responses being uploaded online.</p>