

Representation	Officer Response
<p data-bbox="185 316 427 347">P14: Tall buildings</p> <p data-bbox="185 355 409 424">Organisation: GLA NSPPSV66</p> <p data-bbox="185 464 405 496">P14 Tall buildings</p> <p data-bbox="185 536 1227 711">The Mayor welcomes the inclusion of a map which shows where Southwark would expect tall buildings. However, the Mayor believes this map could be further refined to take into account viewing corridors, conservation areas and historic assets and with a more fine grained assessment of specific locations / areas. The policy should also set out some parameters indicating the acceptable building heights in each area.</p>	<p data-bbox="1261 355 2063 818">P14 is considered compliant with the Mayor’s adopted London Plan (2016) and the emerging draft New London Plan, as the workings of our plan-led approach is set out in the emerging Tall buildings background and research paper with an urban context evaluation section mapping out constraints within the Borough. Further to this specific site allocations have been identified to anticipate tall building development within the guidance section to ensure that there is a clear plan-led approach to constructing tall buildings. The background and research paper also discusses how ‘appropriate, sensitive and in appropriate locations’ have been identified. 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.</p>
<p data-bbox="185 863 936 932">Organisation: Transport for London Commercial Development NSPPSV182</p> <p data-bbox="185 971 1227 1254">The amended policy appears to require publicly accessible space to be provided on or near to the top of all buildings that are higher than 30m (3.2); however, the wording of the policy is ambiguous. This is not reasonable or practical for buildings that are potentially as low as ten storeys. Irrespective of height, this also has management and security implications which would be unacceptable in TfL housing projects. For security reasons, TfL would also be unlikely to sanction public access to any office building that it develops for its own use.</p> <p data-bbox="185 1294 1227 1362">Similarly, the requirement for new public space (3.1) and widened footways (3,2) is too prescriptive and may not be possible on constrained sites.</p> <p data-bbox="185 1402 1133 1434">These requirements are not justified and should be deleted from the draft Plan</p>	<p data-bbox="1261 863 2063 1002">Representation noted. Policy P14 has been updated to re-word the previous policy requirements of point 3 to not be only applicable to developments above 30m and 60m, but a standard for all tall building developments.</p>

Individual
NSPPSV193

This response references height and massing. Please see full response to comment on.

Twice the size of the Quill HEIGHT / MASSING

Too big for the local context ENVIRONMENTAL IMPACT: WIND MITIGATION

Tree planting on St Thomas Street - NOT VIABLE

FAILURE TO DEMONSTRATE

VIABILITY OF WIND-MITIGATION

- Tree trench not wide or deep enough to take real size root ball
- No drainage consideration
- Planted half in highways land
- Basement line would need to be pulled back for viable planting
- Mitigation is REQUIRED not optional. Current proposal demonstrates that the REQUIRED MITIGATION is NOT VIABLE
- Why have developers not been asked by Southwark officers to provide a sufficient level of detail?
- May not be possible to plant trees in pits below ground level.

Planters above ground however would block important pedestrian movement on St Thomas Street. REQUIRED MITIGATION

“..strong winds would occur at

localised areas at ground floor

level along St Thomas Street...

these strong winds represent a potential safety risk for pedestrians and cyclists and therefore require mitigation.”

- A row of three ~8m trees on St Thomas Street
- A row of two ~2m wide x ~2m tall 50% porous screens on St Thomas

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It should be acknowledged that the NSP and its policies must be read as a whole. Site allocations that have been designated to anticipate tall buildings have been strategically assessed through our Sites Methodology Paper. This methodology paper underpins the site vision section to 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.

Open spaces and biodiversity have been evaluated in our Open Spaces background paper submitted as part of the plan. Any current deficiency in open space has been directly addressed as part of this research. P56 Open space sets out the protection of existing designated MOL, BOL and OOS and P58: Green infrastructure indicates that "large-scale development must provide new publically accessible open space and green links". This is to ensure that all new development satisfactorily account for an increase in population and improve their access to open space.

Street

- 1.5m hedge at ground level along the east facing facade ENVIRONMENTAL IMPACT: WIND MITIGATION Hedge Planting on Eastern Boundary - NOT VIABLE

Street Level Mitigation Key

1.5m high hedge

Pedestrian movement

FAILURE TO DEMONSTRATE

VIABILITY OF WIND-MITIGATION

- Hedge (NOT SHOWN) clearly conflicts with 'active frontages' and pedestrian movement! ENVIRONMENTAL IMPACT: HERITAGE Desecration of Conservation Area and Heritage Settings

OVERBEARING HEIGHT

- Bermondsey Street Conservation Area and St Thomas Street Listed Railway Arches overwhelmed

- Design Review Panel (DRP) Report effectively ignored with token reduction in height by only 20m

- Questionable choice of local views left undeveloped in Townscape, Visual and Built Heritage

Assessment where (for example)

the proposal is clearly visible on

Bermondsey Street: CONSULTATION AND CUMULATIVE IMPACT

Against local opinion and policy

FAILED ENGAGEMENT PROCESS

- Cumulative DRP process promised and withdrawn without explanation
- Cumulative height / massing of (fully developed) schemes constantly withheld during 'Framework'

The specific definitions of Open Space referred to in P56 are outlined in the fact box after P56 and in the Glossary. This makes it clear that landscaped amenity land, land with a building are not included in the MOL, BOL or OOS designations.

engagement despite requests and clear concerns being raised.

- Misrepresentative and misleading SCI reports for example claiming ‘...majority support for Greystar’s proposals’ when in fact 58% of respondents disagreed with the statement ‘I support the design of the proposals’.

Cumulative Elevation made from ‘St Thomas Street East’ current applications with blue colour highlight of existing elevations

AGAINST LOCAL POLICY

- The proposal for 31,500 sqm constitutes 95% of the projected capacity for Site Allocation NSP52 of the New Southwark Plan (NSP) leaving only 2,000 sqm for the planned redevelopment of Beckett House making it unviable: the proposal is TWICE AS LARGE as would be expected on this site.

- Against amended Policy SP2 of the NSP by being in advance (/ absence) of a ‘social regeneration charter’ or ‘place plan’ for the area. **AGAINST POLICY AND PROMISES**

- Off-site provision and in-lieu payments should be in exceptional circumstances only

- Council leader's re-election speeches referred to a new era of policy compliance on this issue

POOR PLANNING PRACTICE

- Highly questionable study by KPF showing non-viability of onsite provision was left out of the application and consultation
- 80 sites were identified but only 3 were considered by the developer
- No evidence of proper local offsite consideration: why not at Leathermarket JMB for example?

Map Key
 18/AP/0900 Site
 Southwark Housing Estates
 Housing Blocks SOCIAL/ AFFORDABLE HOUSING
 In lieu payment = 0% on-site PUBLIC BENEFIT V.S. PRIVATE PROFFIT
 A repeat of the Quill: for financial gain only MISSING CIL:
 £27M

- Huge CIL calculation error in officer report
- Viability reports out of date and unavailable

Individual
 NSPPSV322.3

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:

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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.

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
NSPPSV333

to constructing tall buildings. 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.

Tall building development will be assessed against all policies in the NSP, including policy P54: Protection of amenity which provides guidance on how to mitigate impacts related to daylight and sunlight. It should be acknowledged that the NSP and its policies must be read as a whole. Site allocations that have been designated to anticipate tall buildings have been strategically assessed through our Sites Methodology Paper. This methodology paper underpins the site vision section to 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.

Representation noted. P14 is considered compliant with the Mayor's adopted London Plan (2016) and the emerging draft New

I do not consider the plan to be legal and sound because of the following issues with the P14 tall buildings policy. Firstly, the areas in Map 1. where tall buildings are expected/to be encouraged is too vague and non-specific. Tall buildings, by their very nature, have a significant impact on the local area (positive or negative). However, many of the areas contained within Map 1. are historic neighbourhoods and conservation areas and are sensitive to tall buildings. In and near these areas, tall buildings would have detrimental impact on the areas unique character and feel. This contradicts policy 2.6 (Avoid unacceptable harm to the significance of designated heritage assets or their settings). Tall buildings should not be encouraged on site allocations in Camberwell and Peckham due to the conservation areas nearby. Tall buildings on these sites would contradict policy 2.6 and 2.2 (Respond positively to local character and townscape).

The large area shown on Map 1. will almost certainly lead to a detrimental impact on the skyline as it encourages a scattered approach to tall buildings. This scattering approach to tall buildings will lead to an incoherent skyline, rather than a coherent one. In addition, Map 1. does not take into account London's strategy views and therefore contradicts policy 2.0 (Not cause a harmful impact on strategic views).

The definition of tall buildings as significantly higher than surrounding buildings lacks clarity.

Tall buildings also encourage a contradiction with Southwark's affordable housing policies. Recent viability reports from the GLA show how it is more difficult to achieve policy compliant levels of affordable housing in tall buildings. In addition, tall buildings have also been shown to be more energy intensive and therefore less environmentally sustainable. Therefore, the tall buildings policy also contradicts policy 2.7 (Maximising energy efficiency).

High densities of housing is supported through low-medium rise development of sites not tall buildings. Map 1. should be more specific in the areas that tall buildings are encouraged. This map should take into account the strategy viewing corridors, areas in conservation areas and take a specific approach to where tall buildings are appropriate.

London Plan, as the workings of our plan-led approach is set out in the emerging Tall buildings background and research paper with an urban context evaluation section mapping out constraints within the Borough. Further to this specific site allocations have been identified to anticipate tall building development within the guidance section to ensure that there is a clear plan-led approach to constructing tall buildings. The background and research paper also discusses how 'appropriate, sensitive and in appropriate locations' have been identified. 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.

Heritage-led regeneration is a concept in support of Policy 7.9 of the adopted London Plan, which states:

"A. Regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration. This includes buildings, landscape features, views, Blue Ribbon Network and public realm."

B. The significance of heritage assets should be assessed when development is proposed and schemes designed so that the heritage significance is recognised both in their own right and as catalysts for regeneration. Wherever possible heritage assets (including buildings at risk) should be repaired, restored and put to a suitable and viable use that is consistent with their conservation and the establishment and maintenance of sustainable communities and economic vitality

C. Boroughs should support the principles of heritage-led regeneration in LDF policies".

The statement 'Some of these site allocations have identified possible sites for tall buildings in Peckham and Camberwell town centres taking account of conservation areas and other heritage assets.' should be removed and the comments relating to tall buildings on site allocations in Peckham and Camberwell should be removed.

Statement changed to : 'Tall buildings are buildings twice the height of surrounding buildings or their emerging context'

These changes will make the policy compliant as it removes the contradictions within the policy.

SP2 therefore supports the adopted London Plan through the incorporation of heritage-led regeneration, and is sound. It should be noted that all policies in the NSP are intended to be regarded as a whole, meaning there may be some cross-over between different Strategic Policies.

The Area Vision and site allocations for Camberwell are described in the New Southwark Plan. These will be used alongside the NSP policies to deliver regeneration and conservation in Camberwell. The Camberwell Action Plan is currently being prepared which sets out the council's most current strategy in regards to regeneration in Camberwell.

Organisation: DP9 Ltd on behalf of BL CW Holdings Ltd (British Land)
NSPPSV336

Paragraph 3.1 requires that proposals for new tall buildings must provide a new publically accessible space at or near to the top of the building and communal facilities for users and residents when above a height of 60m. It is not appropriate to require all buildings above 60m to provide publically accessible space at/near the top of the building. It is unclear how this policy is justified and why it should be required in all cases. We suggest that wording such as "buildings which exceed 60 metres in height should provide a publically accessible area on upper floors where feasible".

These representations are submitted alongside and should be read in conjunction with the comments submitted by British Land in relation to previous iterations of the New Southwark Plan.

Representation noted. Policy P14 has been updated to re-word the previous policy requirements of point 3 to not be only applicable to developments above 30m and 60m, but a standard for all tall building developments.

Organisation: Wells Way Triangle Residents Association (WWTRA)
NSPPSV115

Individuals

P14 is considered compliant with the Mayor's adopted London Plan (2016) and the emerging draft New London Plan, as the workings of our plan-led approach is set out in the emerging Tall

WHAT MAKES THIS AMENDED POLICY UNSOUND?

1. The amended policy P14 is not justified or positively prepared because it introduces a fundamental policy change about tall buildings with no evidence to support or justify the change.

The 2011 Core Strategy identified specific locations in the borough where tall buildings would be appropriate. This was underpinned by a research paper produced in March 2010 (CDD1). Amongst other things, CDD1 made it clear that tall buildings would be sensitive in areas where they might have a negative impact on the setting and views of public and protected open spaces.

In response to earlier consultation on the new draft Southwark plan, Southwark says: "Policy P14 ... is supported by our revised tall buildings background research paper." Later in the same document it says "We are currently preparing our Tall Buildings background paper, and the policy will be amended accordingly." There is no reference to a research paper in the proposed submission version, and it is nowhere to be found on the Southwark website.

The new Southwark Plan makes no reference to the impact of tall buildings on protected open spaces.

2. The amended policy P14 is unsound (not effective) as it doesn't define what a tall building is.

The current Southwark Plan was very clear about this: page 107 of the Core Strategy defined tall buildings as higher than 30 metres.

We have lost this clarity in the new policy, which simply states: "Tall buildings are significantly higher than surrounding buildings or their emerging context".

There is no definition of the word 'context' – does it mean a specific road, an area, a neighbourhood, the entire borough of Southwark, or London more widely?

buildings background and research paper with an urban design evaluation section mapping out constraints within the Borough. The background and research paper also discusses how 'appropriate, sensitive and in appropriate locations' have been identified. Further to this specific site allocations have been identified to anticipate tall building development within the guidance section to ensure that there is a clear plan-led approach to constructing tall buildings. 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.

It should be acknowledged that the NSP and its policies must be read as a whole. Site allocations that have been designated to anticipate tall buildings have been strategically assessed through our Sites Methodology Paper. This methodology paper underpins the site vision section to 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.

Open spaces and biodiversity have been evaluated in our Open Spaces background paper submitted as part of the plan. Any current deficiency in open space has been directly addressed as part of this research. P56 Open space sets out the protection of existing designated MOL, BOL and OOS and P58: Green infrastructure indicates that "large-scale development must provide new publically accessible open space and green links". This is to ensure that all new development satisfactorily account for an increase in population and improve their access to open space.

The specific definitions of Open Space referred to in P56 are outlined in the fact box after P56 and in the Glossary. This makes it clear that landscaped amenity land, land with a building are not

The word 'emerging' is a recent addition to P14. If the word 'context' itself is unclear, 'emerging context' is even less clear. As an example: there is a planning application for a 48-storey building on Old Kent Road, near the eastern end of Burgess Park. Are 48-storey buildings therefore the emerging context for Burgess Park?

3. P14 is unsound (not justified) because it is self-contradictory: the evidence base fails to identify in sufficient detail where tall buildings may have a detrimental effect on protected areas, such as public open space and conservation areas. It is also not effective because it is incompatible with policies SP6, P59 and P54
Paragraph 2.6 of P14 refers to avoiding harmful environmental impacts including overshadowing. This is in direct conflict with one of the site allocations mentioned in P14 where tall buildings "may be possible", namely Burgess Business Park. Part of this site is directly on the boundary of Burgess Park's nature reserve. Burgess Park is an area of protected open space and a Site of Importance for Nature Conservation.

P14 would allow tall buildings to be built on the boundary of the park, which would have a harmful environmental impact: tall buildings would overshadow the nature reserve, causing a detrimental effect on biodiversity, and introducing human interference (eg artificial light) to a site where the council wants to encourage wildlife.

SP6 refers to "Protecting and improving our network of open spaces, trees and biodiverse habitats..." Overshadowing from tall buildings on the boundary of Burgess Park would be a positive threat to biodiverse habitats.

P59 is specifically about biodiversity. It says that "Development must contribute to net gains in biodiversity through:

"1 Enhancing the nature conservation value of Sites of Importance for Nature Conservation (SINCs), Local Nature Reserves (LNRs), designated and undesignated ancient woodland, populations of protected species and priority habitats/species identified in the United Kingdom, London or adopted Southwark Biodiversity Action Plan; and

"2 Avoiding damage to SINCs, LNRs, populations of protected species and priority habitats/species."

included in the MOL, BOL or OOS designations.

Tall building development will be assessed against all policies in the NSP, including policy P54: Protection of amenity which provides guidance on how to mitigate impacts related to daylight and sunlight. It should be acknowledged that the NSP and its policies must be read as a whole. Site allocations that have been designated to anticipate tall buildings have been strategically assessed through our Sites Methodology Paper. This methodology paper underpins the site vision section to 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.

Tall buildings on the boundary of Burgess Park would undermine the conservation value of the SINIC, and overshadowing would damage the SINIC.

P54, Protection of amenity, says "Development should be permitted when it does not cause an unacceptable loss of amenity to present or future occupiers or users." Burgess Park is a public park which provides a valuable amenity to its users: an escape from the urban environment. Tall buildings on the boundary of Burgess Park would fundamentally change this: the urban environment would intrude. Buildings would be visible above the treeline, and park users would be overlooked by private flats and balconies.

4. P14 is unsound because it is not consistent with the Mayor's current London Plan (2016) or the new Draft London Plan

Policy 7.7 of the Mayor's current London Plan (2016) says:

- "Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations".
- "Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks".

Policy D8 of the new Draft London Plan says:

- "Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".
- "Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate".

P14:

- does not define a tall building other than to say it is "significantly higher than surrounding buildings or their emerging context" (and it does not define "significantly").
- does not mention a plan-led approach or explain how sites will be assessed to consider whether they are appropriate, sensitive or inappropriate for tall and large buildings. P14 would open the door to significant changes to the character of low-rise

neighbourhoods that are developer-led rather than plan-led.

- does not identify the building heights that would be appropriate.
- says that new tall buildings must be "of exemplary architectural design" but does not define 'exemplary' - this is a very subjective term. Who will decide whether something is exemplary?

5. P14 is not sound because it is badly-drafted. Paragraph 2.8 is a direct repeat of paragraph 2.5. A tall buildings background research paper should be published.

The policy should:

- explain how Southwark takes a plan-led approach to tall buildings, and how 'appropriate, sensitive and inappropriate locations' will be assessed.
- define what is meant by 'tall building' and identify the general building heights that would be appropriate
- define what is meant by 'context'
- define what is meant by 'emerging context'
- clearly state that tall buildings would be sensitive in areas where they might have a negative impact on the setting and views of public and protected open spaces
- define 'exemplary architectural design' and explain how and by whom 'exemplary' will be assessed
- make it clear that tall buildings will not be allowed near the boundary of Burgess Park.

Paragraph 2.8 should be deleted.

Individual
NSPPSV339

With reference to today's consultation deadline on the various policy amendments reflecting the council's consideration of comments on the NSP up until February 2018:

With reference to P14 (Tall Buildings), I do not consider the policy to be sound because the 'tall buildings map' is too vague to be effective in any meaningful sense. The definition of what amounts to a 'tall building' is likewise too vague given the multiform contexts that seem to be considered possible.

P14 is considered compliant with the Mayor's adopted London Plan (2016) and the emerging draft New London Plan, as the workings of our plan-led approach is set out in the emerging Tall buildings background and research paper with an urban design evaluation section mapping out constraints within the Borough. The background and research paper also discusses how 'appropriate, sensitive and in appropriate locations' have been identified. Further to this specific site allocations have been identified to anticipate tall building development within the guidance section to ensure that there is a clear plan-led approach

<p>In addition I feel that it would not deliver enough housing, and that any high rise housing constructed would be both inordinately expensive to run/maintain in the long term, as well as being carbon intensive to construct. Lower/mid rise housing is generally considered preferable in these respects.</p> <p>With regard to NSP42, I have continued concerns about the high-rise redevelopment of this site, both for the above reasons, and because of its detrimental impact on the setting of the listed Trinity Church Square conservation area.</p> <p>It continues to be a point of contention that the originally envisaged tall buildings cluster at Elephant & Castle is now being considered as far north as NSP42.</p> <p>I do not consider the present policy to be either effective or sound.</p>	<p>to constructing tall buildings. 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.</p> <p>Tall building development will be assessed against all policies in the NSP, including policy P54: Protection of amenity which provides guidance on how to mitigate impacts related to daylight and sunlight. It should be acknowledged that the NSP and its policies must be read as a whole. Site allocations that have been designated to anticipate tall buildings have been strategically assessed through our Sites Methodology Paper. This methodology paper underpins the site vision section to 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.</p>
<p>Individual NSPPSV340</p> <p>Tall buildings block out the light for residents already residing in Southwark, who have the right to light. Surrounding Southwark residents need to be compensated under the Right to Light act and also need to be considered for employment with the many developers in the area.</p>	<p>Tall building development will be assessed against all policies in the NSP, including policy P54: Protection of amenity which provides guidance on how to mitigate impacts related to daylight and sunlight. It should be acknowledged that the NSP and its policies must be read as a whole. Site allocations that have been designated to anticipate tall buildings have been strategically assessed through our Sites Methodology Paper. This methodology paper underpins the site vision section to 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.</p>
<p>Organisation: CBRE NSPPSV344</p> <p>Royal London strongly supports the principle of tall buildings in the Old Kent Road</p>	<p>Positive representation acknowledged. Policy P14 has been updated to re-word the previous policy requirements of point 3 to not be only applicable to developments above 30m and 60m, but a standard for all tall building developments.</p>

Opportunity Area Core as set out within Policy P14 (shown on Map 1 in the document) and supports the detailed design guidance that is provided in order to ensure that tall buildings are of the highest quality. There is a requirement at Policy P14, 3.3 to “Provide a new publicly accessible space at or near to the top of the building and communal facilities for users and residents when above a height of 60m”. This requirement is likely to be challenging to commit to due to a range of factors including security issues, management and access considerations. To address this we suggest the following amendments:

“Consider the provision of a new publicly accessible space at or near to the top of the building and communal facilities for users and residents when above a height of 60m. This consideration should take into account management and security issues together with the range of other planning contributions delivered by the proposals”.

This matter was previously raised in our representation dated 27th February 2018.

Organisation: Bermondsey Street.London
NSPPSV347

The previous policy on tall buildings has been amended to take account of the requirement in the London Plan for publicly-accessible space on top of landmark buildings. The London Plan policy requires free publically accessible space on top of tall buildings which can be used to require public space when needed. Usually this will be for landmark buildings. Area Action Cores were added to the list of areas where tall buildings will typically be located to ensure the New Southwark Plan, Area Action Plans and Visions are all aligned.

The amended policy is unsound because:

- There is no definition of where tall buildings are appropriate – simply a comment that area action cores are ‘typical’ – which means that the Council will not be able to stop tall buildings from getting permission even in vulnerable areas
- The definition of a ‘tall building’ as “significantly higher than surrounding buildings or their emerging context” is vague and open to interpretation and re-interpretation, failing to provide a firm basis for decisions by local planning officers – what does ‘significantly taller’ mean? What does ‘emerging context’ mean? This vagueness undermines other policies on the conservation of the historic environment and natural heritage (Policy P18).

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- There is no definition of what makes a tall building a 'landmark' building
- There is no definition of what constitutes 'publicly-accessible' – under the present wording a developer could propose to open a space one day a year to invited guests, and that could meet the 'publicly-accessible' requirement while doing almost nothing to improve public amenities

- It does not provide a policy basis for assessing when a proposed development provides adequate public space for all the additional people, greening or protection against wind or other environmental impacts

CHANGES NEEDED TO MAKE THE POLICY SOUND.

The policy should define:

- What is meant by a tall building
- Where tall buildings will be allowed
- What makes a tall building a landmark building
- Where publicly-accessible space is required, what minimum requirements must be met to make it 'publicly-accessible'
- What is meant by emerging context
- When policies conflict, which policy will take precedence
- Contain policies on the environmental impacts of tall buildings – pressure of people on public spaces, landscaping, wind and other environmental impacts.

further guidance on the expectations for the site in regards to how development can integrate with the existing context.

Individual
NSPPSV42

From it's first - very sneaky appearance - in a plan a long time back the 'tall buildings map' (p14 Tall Buildings - amended) yet again is very vague and seems to be more a simple legal loophole to justify the building of every increasingly large buildings that i do not feel serve the wider community well. Already we have countless empty skyscrapers along the south bank - a friend works for a company who actually have a job in keeping the lights on in empty unsold flats so they look like they're lived in. Right now they are shiny and new - but give it 5, 10 years - will they be able to sustain the upkeep? Will we have slums in the skies - these buildings are unbelievably complex and costly to maintain and there is no real serious look at what would happen in the case of a huge financial crash.. What if the landowners decide it is no longer cost effective to maintain them to a suitable standard. We have seen this with countless council blocks

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from the post war period - who is to say this wont happen in the private sector too? These giant towers will loom over everyone - once they are up there is no escape from them visually. They will have a hugely detrimental impact on the wellbeing of the community as they rob everyone of sunlight, a horizon and create large wind tunnels on St Thomas Street. Why do we need more? I would like to speak at the examination in public and I would like Southwark to decrease the size of the tall building map and also to put height restrictions on those buildings, using Guys Hospital NOT the Shard as the start point for a ever decreasing roof line.

NSPPSV353

I would like to comment on P14 Tall Buildings (Amended Policy)

In addition, I would like to speak at the Examination in Public

I do not consider the plan to be legal and sound for the following reasons:

- I do not consider the Plan to be legal and sound because it is not effective and does not take into account the continued impact on the environment from these tall buildings that are in breach with the Southwark statement to be carbon neutral by 2020. ALL of these buildings will be built after the 2020 deadline –stated by the council to be carbon neutral. In addition, the consultation has been woefully ineffectual in including participation of the local community and stakeholders in the area.

- Wholistic design: The amended policy shows where tall buildings are expected to be. This map is vague and unclear. There is no graphic illustration of where tall buildings are anticipated. As the developments come before the planning committee, they are taken one at a time, and the impact on the whole of the community should be inherent

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P69: Energy sets out the minimum standards for all major developments, reducing the carbon dioxide emissions in line with the minimum requirements of the London Plan which includes 100% on 2013 Building Regulations Part L standards for residential development; and a minimum of 40% on 2013 Building Regulations Part L up to 2019, and zero carbon (100%) from 1 January 2019 onward, for non-residential development. This follows governmental guidance which is to procure ambitious targets to minimise Greenhouse gas emissions (Policy SI2 of the New London Plan). For development that do not meet these minimum

in any development.

- Degradation of Communities: The amended policy defines tall buildings as 'significantly higher than surrounding buildings or their emerging context'. This statement is meaningless and fails to identify precisely where tall buildings are considered to be suitable or the cumulative impact of clustering. The London plan states that buildings must be in line with the current culture of existing communities. There is a new Social Regeneration Charter for the Old Kent Road which set out the ways in which Southwark Council intends working with local communities. The consultations have been piecemeal, ineffectual in engaging with the community, ways of participation for those who are tech savvy have lacked clarity or transparency.
- Viability: The GLA report dated 2018 on Tall Buildings, affordable housing and viability evidences that overall tall buildings are not generating fast track, affordable housing and that there is the potential to design out affordable housing as the additional costs of construction and maintenance reduce the surplus available for delivering affordable housing. There are (one slated for the current B&Q space on OKR) are clearly stating that they are not viable, yet permission was granted.
- Housing: The density of tall buildings are woefully inadequate in delivering the type of housing needed to address the council stated housing shortages in Southwark. Current developments focus on 1 and 2 bedded properties, clearly inadequate for the backlog of families needing accommodations.
- Environmental: Tall buildings are not carbon neutral. Southwark has pledged to become a carbon neutral Borough by 2030 in line with the Mayor of London's aspirations. Tall buildings are in conflict with this and contradict NSP policies Healthy, Active Lives and Best Start in Life. Therefore, I do not consider the Plan to be legal and

requirements, the council has a carbon offset scheme in place where mitigation of the shortfall against carbon emissions reduction requirements are secured off-site through financial contributions. The provision of tall buildings and their subsequent phasing plans, regardless of when construction commences, will be subject to these policies. This ensures that new development in the borough meets the highest energy standards to help us meet targets moving towards Carbon neutrality by 2030.

Carbon offset funds are released by the Council incrementally and through approval by planning committee, to ensure that the impacts of the spending of offset money most effectively contributes to the wellbeing of our communities and in line with the Council's targets for sustainable development. The designation of carbon offset funds through planning committee, which are open to public engagement and available to view online.

Secondly, social regeneration charters are currently in the process of being developed throughout the borough. These will be designated to all of the opportunity areas in the borough and they function to align the communities' priorities and visions for the future of their area and encompass their targets for sustainable development. This will help guide distribution of CIL funds and ensure that allocation of funds is optimum to what has been identified as providing the most benefit to our communities. This aligns the council's desires with our communities' and makes the most of the funds received from developer's as part of the regeneration process.

sound because it is not effective and does not take into account the continued impact on the environment from these tall buildings that are in breach with the Southwark statement to be carbon neutral by 2020. ALL of these buildings will be built after the 2020 deadline – stated by the council to be carbon neutral.

In addition, the consultation has been woefully ineffectual in including participation of the local community and stakeholders in the area. - Southwark has moved up its' target to be carbon neutral by 2030. This does not square with the planning permissions for tall building developments that are being approved with such haste, down the Old Kent Road, that the residents do not have a chance to be adequately informed or voice their opinions (despite the work from the local councillors).

There have been two high-profile developments: Ruby Triangle and the development at the current site of B&Q on Old Kent Road, that have, without embarrassment, paid the carbon offset fee (of around £1 Million) instead of working to make the developments carbon neutral. Indeed, the development at B&Q is not financially viable, yet still received planning permission.

Southwark needs to decide if it is going to be carbon neutral and demand carbon neutral developments or to continue to see tall building developments as a revenue stream, as carbon offset fees are happily being paid by developers so that the development can get through committee.

The carbon offset fees are a one off – easily included in a contingency line-item in the developer's budget. Yet, the community in Southwark will continue to pay a price via climate change for years to come.

- Levitt Bernstein, a UK leading expert in housing design and construction submitted recent evidence on the London Plan to the GLA in relation to tall buildings and stated the following:

“We are very concerned by the recent proliferation of tall buildings, particularly the increase in residential towers. Such an increase in high rise residential buildings also takes us into uncharted territory in terms of their long-term environmental and social

impacts. There are relatively few precedents when it comes to major refurbishment. Historically, new build high-rise blocks have tended to be in council ownership and flats have been rented albeit with some leaseholders as a result of Right to Buy. This has made it possible to decant residents where major work is needed; Park Hill in Sheffield is a good example. This is much more difficult when flats are sold. It will be almost impossible to empty a private tower block when major work is needed 20-40 years on. The risk is that they fall into gradual decline with only urgent repairs carried out on an ad hoc, piecemeal basis. As the building degrades, people will leave. Those who remain may find it hard to sell and/or find themselves in negative equity, and service charges may no longer cover costs. We know that physical decline is linked to social and economic decline; in promoting tall buildings (which is effectively what is happening) the GLA should be mindful of the long-term social and practical implications, particularly as tall buildings are inevitably also visually dominant.

The evidence of experts in this matter should be given due weight.

- This Policy can be made sound. There are alternative means of achieving population density, avoiding urban sprawl and increasing activities and life opportunities for nearby residents. Some of the highest levels of population density in London are in Westminster and Kensington and Chelsea. These Boroughs rarely have residential buildings above 8 storeys. Whilst this does not achieve the density of the very tallest buildings they are carbon neutral, family friendly and avoid the unpleasant environmental effects associated with tall buildings.

This policy can be made sound by the following:

- Southwark is well aware that the area of OKR that is to house these mega structures has the lowest life expectancy of the whole borough (or London). The information as well as the knowledge and expertise of these communities and stakeholders should be harnessed as plans evolve by sense checking and producing information that is readily accessible and understandable in a variety of ways (paper, digital, open meetings, etc) through a variety of ways (churches, community outreach, hosted events, etc) to maximise the number of participants. Given the scope of this disruption to OKR,

Southwark should take it upon itself to ensure that old and new ways of communicating with communities is explored. The old way is not working!

- I reiterate what a number of people have stated; existing, local communities should benefit directly from the sums of money generated by development and environmental fees and they should be invited participants in the formulation of the S106 agreement.

- It is inevitable that differences of opinion and issues of power will emerge but currently regeneration is development led. This balance needs to shift in favour of local communities for this strategic policy to be made sound, and to ensure that the communities experience the minimum of disruption in order to continue to thrive. This includes taking into account the impact of mega towers will have on communities, mental health and access to amenities.

- Looking beyond mega towers to more salubrious developments that foster well balanced and carbon neutral communities, with assets that address the very real need for Southwark 'families' a space to grow and thrive.

- Should not the developers continue to pay the environmental (carbon tax) fee for the lifetime of the development? Or, better yet, if Southwark sees these fees as a revenue generating activity, then a percentage of the build costs should be incurred, say 10% of the build cost. Thereby, the developers would take seriously the need to develop a scheme that is carbon neutral, in line with the Southwark promise to be carbon neutral by 2030. These developments will last longer than 2030, yet still not be carbon neutral – thereby, they neither support the documented dictate that the council become carbon neutral by 2030, nor help solve the 'climate emergency' as called by the government.

What will the council do to ensure that all developments up and down the OKR are carbon neutral? How will the community benefit from the carbon offset fees during the life-time of the development?

Individual
NSPPSV56

P14 is considered compliant with the Mayor's adopted London Plan (2016) and the emerging draft New London Plan, as the

I do not consider this policy sound as it is not justified, effective, positively prepared or consistent with national or regional policy.

- Map 1 is not specific enough to know where tall buildings are appropriate. It is part of the unjustified and not effective re-development-led approach to regeneration. This has the

4

effect according to this map of a major part of half the borough being labelled as targets for redevelopment just because they have been labelled 'regeneration'.

- The amendment mentions that tall buildings are encouraged in Peckham and Camberwell and sites identified in those areas for tall buildings. Again this seems to have followed the designation of Peckham as a regeneration area rather than that tall buildings were appropriate taking into account the nature of the neighbourhood.
- In Peckham this inappropriate tall buildings approach was created first in the Core Strategy in 2010 where there was no awareness in Peckham that such a policy was being proposed because Peckham was designated as a regeneration area. No objections to this policy were allowed at the EiP of the PNAAP in 2013 simply because it was already in the Core Strategy. As a result since then developers have been encouraged to include a tall building in their plans for the redevelopment of the Aylesham Centre when detailed knowledge of the neighbourhood with its Conservation Area and its developing local economy showed that this was the wrong policy for the sites to the south. These include the Bussey Building and the repurposed multi storey car park both of which are now highly successful venues for the local economy. The views from their upper floors and rooftops are an essential part of their attraction as venues. Tall buildings in the way of those views are not appropriate. This example demonstrates how the approach shown by this policy which encourages tall buildings in large areas of the borough is not justified or effective.
- This blanket approach to encouraging tall buildings over wide areas is not consistent with the London Plan both the current one and the emerging one which says that there must be a plan led approach to identifying suitable and unsuitable locations. This policy does not do that.
- It might be justified to ignore these important aspects if tall buildings would solve the provision of housing to meet the desperate need for housing within the means of most

workings of our plan-led approach is set out in the emerging Tall buildings background and research paper with an urban context evaluation section mapping out constraints within the Borough. Further to this specific site allocations have been identified to anticipate tall building development within the guidance section to ensure that there is a clear plan-led approach to constructing tall buildings. The background and research paper also discusses how 'appropriate, sensitive and in appropriate locations' have been identified. 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.

Site allocations that have been designated to anticipate tall buildings have been strategically assessed through our Sites Methodology Paper. This methodology paper underpins the site vision section to 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 temporary loss of housing is with the intention of providing a long-term increased capacity of housing stock, including affordable and socially-rented. Where the council has demolished affordable housing, where viable, we will seek to replace this like-for-like or else increase the level of affordable housing. In a number of instances, estate regeneration has been required due to the quality of the existing housing stock which is not considered fit for purpose.

The Council Plan 2018/19-2021/22 sets commitments for the borough. This includes introducing ballots on any new estate regeneration and a Consultation Charter to ensure local residents can hold private sector developers to account. The ballot system

people in the borough and especially those on the waiting list. But there is much evidence from the tall buildings being given planning permission that they are creating housing that is not within reach of the people in the borough who need housing. This is in addition to the indications that tall buildings are not sustainable in terms of maintenance costs into the future as well as not being carbon neutral. The amendments do not make this tall buildings policy sound.

Some changes to make the policy sound would include:

- A much more focussed and contained method of identifying where a tall building would be appropriate given the characteristics of the location concerned.
- A statement that areas are not to be seen as appropriate for tall buildings because they have been designated for regeneration.
- In seeking permission for a tall building, a requirement to show that the same quantity and density of lower cost housing cannot be provided by a different configuration of building design at lower heights.

has been introduced for new estate regeneration as has a draft Developer's Charter which ensures developers clearly set out how they have addressed residents' and stakeholders' concerns. The Developer's Charter forms part of our updated Statement of Community Involvement, which will clearly inform residents on how we plan to consult and how they can get involved in directing planning.

Social regeneration charters are currently in the process of being developed throughout the borough. These will be designated to all of the opportunity areas in the borough and they function to align the communities' priorities and visions for the future of their area and encompass their targets for sustainable development. This will help guide distribution of CIL funds and ensure that allocation of funds is optimum to what has been identified as providing the most benefit to our communities. This aligns the council's desires with our communities' and makes the most of the funds received from developers as part of the regeneration process.

Community consultation during the preparation of the New Southwark Plan has been informed by the Southwark Statement of Community Involvement. This document (SCI) sets out how the council will ensure that local communities, residents, businesses and other stakeholders can be involved in local planning decisions the and preparation of regeneration and planning strategies to help to shape the places in our Borough. This document has recently been revised and a new version will be adopted in early 2020. During the preparation of the New Southwark Plan, we held over 85 consultation events in over 59 locations and we sought to engage as much as the community as possible. Further details relating to consultation can be found in the consultation report.

Individual

NSPPSV353

Policy P14 TALL BUILDINGS is not positively prepared.

In 2016 and 2017 the GLA commissioned studies on the relationship between tall buildings, affordable housing and viability. Following an FOI request, these were obtained by Southwark on March 19th this year, and reveal the following:

Tall buildings do not generally deliver fast-track affordable housing.

Increased height does not necessarily deliver additional affordable housing, and in a number of cases it has the opposite effect. (This is particularly relevant for the Aylesbury development, where plans have been changed to increase the number of dwellings.)

Additional construction costs delivering the upper floors can have a negative impact on the viability of the entire scheme.

The P14 does not comply with the London Plan, which requires a plan-led approach to tall buildings. This is relevant to the Aylesbury AAP and Aylesbury Vision, where density could be achieved through approaches and designs other than tall towers and the entirely untested concept of the Old Kent Road AAP. This concept is built around the speculative promise of a tube-line extension and the creation of a town centre along a main traffic artery.

The amended policy P14 is unsound:

since in the Council's New Southwark Plan Proposed Submission Version: Amended Policies 2019 Consultation Report, Jan 2019, the notes repeatedly refer to a Tall Buildings revised research paper which is supposed to support the tall buildings policy. However, this research paper is not currently submitted on the Council website, so there is no way of testing this support.

because no mention is made of fire safety in the tall buildings, a serious risk which is also flagged up in the consultation report.

because it doesn't describe accurately what a tall building is. The policy states: "Tall buildings are significantly higher than surrounding buildings or their emerging context".

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Heritage-led regeneration is a concept in support of Policy 7.9 of the adopted London Plan, which states:

"A. Regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration. This includes buildings, landscape features, views, Blue Ribbon Network and public realm."

B. The significance of heritage assets should be assessed when development is proposed and schemes designed so that the heritage significance is recognised both in their own right and as catalysts for regeneration. Wherever possible heritage assets (including buildings at risk) should be repaired, restored and put to a suitable and viable use that is consistent with their conservation and the establishment and maintenance of sustainable communities and economic vitality

Emerging context can imply that as prospective developments are put forward before reaching planning approval they become the context which defines how tall the buildings will be. This would make it very easy to justify taller buildings.

The policy P14 should be justified in relation to New Southwark Plan Policy P18: Conservation of the historic environment and natural heritage -- Conserve and enhance the significance of heritage assets and their settings including registered parks and gardens. The policy should also be justified in relation to Policy P54: Protection of amenity -- Development should be permitted when it does not cause an unacceptable loss of amenity to present or future users.

Tall buildings over 10 storeys or more next to a heritage space, designated public park or Metropolitan Open Land will necessarily result in a significant loss of public visual amenity because of overlooking and blocking views, increased wind as well as the loss of sunlight and. Shadow studies indicate that tall buildings will have a significant negative impact on Burgess Park, reducing the quality of the green space for the health and well-being of residents. It is particularly important to consider the cumulative impact of multiple developments and multiple buildings. The proposed linear park in the OKR AAP will also be profoundly affected by the height of buildings around it and the apparent lack of ability to prevent developers increasing the number of tall buildings in these designated areas. The NSP needs to identify the relevant standards that these developments will be measured against and how they will reduce adverse local climatic conditions and avoid harmful and uncomfortable environmental results.

CHANGES NEEDED TO MAKE THE POLICY SOUND.

The policy should:
explain how Southwark takes a plan-led approach to tall buildings, and how 'appropriate, sensitive and inappropriate locations' will be assessed
indicate what relevant standards will be applied to make this assessment where the tall buildings might have a negative impact on the setting of and vista surrounding public and protected open spaces
define what is meant by 'tall building' and identify the general building heights that

C. Boroughs should support the principles of heritage-led regeneration in LDF policies".

SP2 therefore supports the adopted London Plan through the incorporation of heritage-led regeneration, and is sound. It should be noted that all policies in the NSP are intended to be regarded as a whole, meaning there may be some cross-over between different Strategic Policies.

Tall building development will be assessed against all policies in the NSP, including policy P54: Protection of amenity which provides guidance on how to mitigate impacts related to daylight and sunlight. It should be acknowledged that the NSP and its policies must be read as a whole. Site allocations that have been designated to anticipate tall buildings have been strategically assessed through our Sites Methodology Paper. This methodology paper underpins the site vision section to 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.

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.

would be appropriate
define what is meant by 'context'
define what is meant by 'emerging context'
define 'exemplary architectural design' and explain how and by whom 'exemplary' will be assessed. One of the OKR forums asked that there be a consultation steering group composed of local residents who could bring to the decision-making process their experience of living in the area, in a variety of homes and with a variety of needs
refer to a published research paper on tall buildings if this is being used to justify tall buildings

Individual
NSPPSV354

I have lived in southwark all my life and love the area. I am dismayed that so many tall building applications have recently been submitted dwarfing the local houses and parks and throwing so much into shade. This is bad for the ecology as plants/grass/bees will be damaged. its bad for mental health to be sitting in shade , particularly in the houses, offices which once had sun.

I now understand that this whole policy is flawed and i have copied and pasted a view which i strongly hold as it is in better language to be taken attention of .
CHANGES NEEDED TO MAKE THE POLICYSOUND.

A tall buildings background research paper should be published. For camberwell residents we should be given some respect and not have a plan which will slip in through the side door awful heights for buildings.

There is not enough transport to support this developments either. Buses are being cut and the train station is over capacity already. We need better transport and train links in any event.

The policy should:

- explain how Southwark takes a plan-led approach to tall buildings, and how 'appropriate, sensitive and inappropriate locations' will be assessed.
- define what is meant by 'tall building' and identify the general building heights that would be appropriate
- define what is meant by 'context'

The Area Vision and site allocations for Camberwell are described in the New Southwark Plan. These will be used alongside the NSP policies to deliver regeneration and conservation in Camberwell. The Camberwell Action Plan is currently being prepared which sets out the council's most current strategy in regards to regeneration in Camberwell.

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- define what is meant by ‘emerging context’
- clearly state that tall buildings would be sensitive in areas where they might have a negative impact on the setting and views of public and protected open spaces
- define ‘exemplary architectural design’ and explain how and by whom ‘exemplary’ will be assessed
- make it clear that tall buildings will not be allowed near the boundary of Burgess Park.

Paragraph 2.8 should be deleted

Organisation Southwark Law Centre
NSPPSV167

Definition & Scope

Tall buildings are not defined. They should be. Although it may be implicit that tall means over 30m, this should be more clearly expressed.

Paragraph 1 refers simply to areas where they “expect” tall buildings. This is unclear language, and does not clearly indicate whether expect means allow/permit or not. The policy should be clearer and set out: a) the circumstances in which tall buildings will be allowed in the areas set out in Map 1; and b) the conditions which must be satisfied for tall buildings in other parts of the borough – if indeed it is envisaged this is acceptable. Map 1 is too broad and demonstrates a poorly evidenced strategy for tall buildings. The draft London Plan states in policy D8 at paragraph A that “based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London.” The NSP currently does not provide this level of detail and so is not in conformity with the DLP. The NSP should define a different tall buildings threshold level as appropriate for different areas.

Furthermore, DLP policy D8 paragraph B states that whether locations are appropriate for tall buildings should be determined by the processes required in Policy D2. These processes require in essence an evidence-driven approach to tall buildings strategy. In particular, this policy does not have any consideration for the cumulative impact of

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tall buildings, despite the requirement to do so set out in policy D8-C-(4) of the draft London Plan.

The NSP should recognise, as the DLP does at paragraph 3.8.1 that “high density does not need to imply high rise”, and that tall buildings should only be acceptable where part of a “plan-led approach to facilitating regeneration opportunities and managing future growth.” Currently, Southwark are proceeding with a plan-free approach with respect to the Old Kent Road and other areas, where tall buildings and arguments about the need for density to deliver borough housing needs are trumping the need to carefully manage and openly scrutinise regeneration strategies.

Tall buildings & Viability

It is crucial the NSP acknowledges that tall buildings must not be allowed to compromise the viability of providing the maximum affordable housing offer which each site can deliver. Viability should be calculated with reference to site, not simply building, as the latter may allow developers to ‘design-out’ affordable housing. Our concern with this negative correlation between building height and affordable housing provision is driven by the Freedom of Information request made to the GLA earlier this year which revealed their own internal studies to have shown such a link, and expressed concern on a London wide basis. This document obtained has been sent Southwark’s planning officers, and will be submitted again in support of this representation at the plan examination if necessary. Define "Tall Buildings"
The policy should be clearer and set out: a) the circumstances in which tall buildings will be allowed in the areas set out in Map 1; and b) the conditions which must be satisfied for tall buildings in other parts of the borough – if indeed it is envisaged this is acceptable.

In accordance with Draft London Plan D8 at paragraph A “ define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London.”

Provide an evidence-driven approach to tall buildings strategy

Viability should be calculated with reference to site, not simply building, as the latter

The Council Plan 2018/19-2021/22 sets commitments for the borough. This includes introducing ballots on any new estate regeneration and a Consultation Charter to ensure local residents can hold private sector developers to account. The ballot system has been introduced for new estate regeneration as has a draft Developer’s Charter which ensures developers clearly set out how they have addressed residents’ and stakeholders’ concerns. The Developer’s Charter forms part of our updated Statement of Community Involvement, which will clearly inform residents on how we plan to consult and how they can get involved in directing planning.

may allow developers to 'design-out' affordable housing.

Individual

NSPPSV356

My concerns fall into two parts. The first is concerned with the overall policy and the second with the identification of the Burgess Business Park as a potential location for tall buildings.

The general objection is that the definition of tall buildings has been weakened. Previously Buildings that were in excess of 30m or significantly taller than their neighbours were to be considered tall and tall buildings were only to be located in the town centres, Opportunity Area Corese, Actiona Area Cores, the CAZ and the locations identified in the published maps.

First, in the proposed policy text, the clearest identifier of tall buildings - a height above 30m - has been lost entirely. Additional requirements for public space are imposed on such buildings but there is no reference to the absolute height of the building in the definition of the word "tall".

Second, even what remains of the definition has been weakened. Previously, "tall buildings were those that were significantly taller than their neighbours". The word "significantly" was not, itself defined but since it has a common sense meaning and the comparator was the immediate physical context, the meaning was (and is) clear. The new definition, allows the promoters of tall buildings to compare them to their emerging context. On this basis, a building would cease to be tall if the "emerging context" (which is not defined and has no common sense meaning) includes buildings of similar height.

On this basis, a developer could argue that, because of an extant permission for one tall building nearby, the next need not meet the exemplary standard of design required of tall buildings. this would be absurd.

Third, where the current policy confines all tall buildings to the areas identified by the

Policy P14 has been re-worded from the previous policy requirements of point 3 to not be only applicable to developments above 30m and 60m, but a standard for all tall building developments.

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plan (and is therefore positively prepared), the new policy does so only for the "tallest" buildings. Again, the term "tallest", is undefined. This suggests that buildings which are merely "tall" can be located outside those zones within the terms of the policy.

Turning to the inclusion of Burgess Business Park, among the allocations which may be suitable for tall buildings, this is a clear case of policy being drafted in order to accommodate, retrospectively, a planning application which was in breach of the extant policies at the time. This location is not and has never been identified, as a suitable location for tall buildings. The application was refused, (against officer recommendations) and is now at appeal. Inexplicably, the breach of the adopted policy on tall buildings was not raised in the report to committee, it was not cited as a reason for refusal and compliance with the policy is now a matter of common ground between the parties. This is despite the fact that, as the report to committee recognises, one of the buildings is undeniably tall and two are "technically tall" (inasmuch as the winding gear for their lift shafts exceeds 30m). The reality is that all three of these blocks are tall on both the criteria established by the current policy, and that several of the others are significantly taller than their neighbours.

Whilst the Council is unable to pursue the tall buildings policy any further because it is not a reason for refusal, neither third parties nor the Inspector who will hear the appeal are so bound. I therefore consider that it would be premature to identify this site as a potential location for tall buildings. The policy should start with a definition of what a tall building is.

That definition should, in my view, reflect the current definition.

"Tall buildings are those which are significantly higher than their immediate neighbours or those which exceed 30m in height."

Buildings which exceed 30m in height should be firmly confined to the Major Town Centres, Opportunity Area Cores, Area Action Cores and the Central Activity Zone and they will be permissible only in areas that benefit from the highest levels of public

transport accessibility and where there is the greatest opportunity for regeneration.

Buildings which are significantly taller than their neighbours may be acceptable elsewhere, but they should earn their greater prominence through exceptional design quality. To be clear, standards of design which might be acceptable in a building that is of a similar scale to its neighbours may not be acceptable in one which is taller and more prominent. The taller and more prominent the building, the higher the standard of design, and material quality, necessity to be acceptable.

No building, tall or otherwise, should have a harmful impact on strategic views, as set out in the London View Management Framework, or to our Borough Views and, any building which has an appreciable impact on the skyline should make a positive contribution to that skyline.

The proposed paragraphs 2.4 to 3.2 should be retained as is.

For the avoidance of doubt, the acceptability of tall buildings in response to "emerging context" should be managed through the site allocations process, not through applications made in response to developers' interpretation of vagueness introduced to policy by the new drafting.

As regards the inclusion of Burgess Business Park as a location where tall buildings will be acceptable, the process by which this has come about is the opposite of plan-led. Its inclusion is based upon the receipt of a planning application which did not comply with adopted policy, and which is now the subject of an appeal. Whilst height has not been raised by the Council, it may be raised by third parties or considered by the inspector. It would therefore be premature to make this allocation in advance of the outcome of appeal being known.

Individual
NSPPSV357

See previous answers

Representation noted.

Organisation Lichfields, on behalf of U and I Group PLC
NSPPSV358

We support the identification that tall buildings are typically appropriate within major town centres, opportunity area cores, action area cores and the Central Activity Zones. The policy identifies that some individual sites where tall buildings may be possible have been identified in the site allocations. We request that the Landmark Court allocation (NSP06) is updated to include reference to the suitability for tall buildings subject to taking into account conservation areas and other heritage assets, given that the site is located in a highly sustainable area and within the CAZ.

Sub-clause 2.4 “be located at a point of townscape significance and have height that is proportionate to the significance of the proposed location and size of the site.” should be deleted for reasons set out above. Paragraphs 3.1, 3.2 and 3.3 which relate to buildings above 30 metres - we consider that this text should be deleted or the policy should be amended to require applicants to consider the feasibility of providing the items within developments.

Sub-clause 2.4 identifies that new tall buildings must “be located at a point of townscape significance and have height that is proportionate to the significance of the proposed location and size of the site.” We disagree that new tall building should necessarily be at a point of townscape significance and request that this text is deleted instead relying on clause 2.1 and 2.2 which require a positive contribution to the London skyline and a positive response to local character and townscape.

We also object to paragraphs 3.1, 3.2 and 3.3 which relate to buildings above 30 metres. We consider it is not reasonable or always practical/feasible to provide a new functional public space, widened footways for publicly accessible space at the top of buildings, which is what the policy requires. We consider that this text should be deleted or the policy should be amended to require applicants to consider the feasibility of providing these items within developments. As currently drafted the policy detail is not justified.

Positive representation noted.

Policy P14 has been updated to re-word the previous policy requirements of point 3 to not be only applicable to developments above 30m and 60m, but a standard for all tall building developments.

Heritage-led regeneration is a concept in support of Policy 7.9 of the adopted London Plan, which states:

“A. Regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration. This includes buildings, landscape features, views, Blue Ribbon Network and public realm.”

B. The significance of heritage assets should be assessed when development is proposed and schemes designed so that the heritage significance is recognised both in their own right and as catalysts for regeneration. Wherever possible heritage assets (including buildings at risk) should be repaired, restored and put to a suitable and viable use that is consistent with their conservation and the establishment and maintenance of sustainable communities and economic vitality

C. Boroughs should support the principles of heritage-led regeneration in LDF policies”.

SP2 therefore supports the adopted London Plan through the incorporation of heritage-led regeneration, and is sound. It should be noted that all policies in the NSP are intended to be regarded as a whole, meaning there may be some cross-over between different Strategic Policies.

<p>Appendix 1: U+I Previous Representations (27 February 2018) will be sent separately via email and the comments should be read in conjunction with these previous representations.</p> <p>We trust these representations alongside our previously submitted representations will be fully considered prior to submission of the draft NSP to the Secretary of State. Should you require any additional information, please contact X.</p>	
<p>Individual NSPPSV362</p> <p>No further comment applied</p>	<p>Supportive representation noted.</p>
<p>Organisation: DP9 Limited (on behalf of Southwark Homes Limited)</p> <p>NSPPSV364</p> <p>Paragraph 3.1 requires that proposals of above 30m must provide a new, functional public space that is appropriate to the height and size of the proposed building; and widened footways and routes to accommodate increased footfall. It is not appropriate to require all buildings above 30m to include new, functional public space and widened footways and routes. It is unclear how this policy is justified and why it should be required in all cases. We suggest the wording is amended to state, "buildings which exceed 30 metres in height should provide functional public space that is appropriate to the height and size of the proposed building; and widened footways and routes to accommodate materially increased footfall where feasible, necessary and appropriate".</p>	<p>Representation noted. Policy P14 has been updated to re-word the previous policy requirements of point 3 to not be only applicable to developments above 30m and 60m, but a standard for all tall building developments.</p>
<p>Individual NSPPSV92</p> <p>I would like to comment on P14 Tall Buildings (Amended Policy)</p> <p>I do not consider the plan to be legal and sound for the following reasons:</p>	<p>P14 is considered compliant with the Mayor's adopted London Plan (2016) and the emerging draft New London Plan, as the workings of our plan-led approach is set out in the emerging Tall buildings background and research paper with an urban context evaluation section mapping out constraints within the Borough. Further to this specific site allocations have been identified to anticipate tall building development within the guidance section to</p>

- The amended policy shows a map (Map 1) where tall buildings are expected to be. This map is vague and unclear. There is no graphic illustration of where tall buildings are anticipated.

- The amended policy defines tall buildings as 'significantly higher than surrounding buildings or their emerging context'. This statement is meaningless and fails to identify precisely where tall buildings are considered to be suitable or the cumulative impact of clustering.

- The GLA report dated 2018 on Tall Buildings, affordable housing and viability evidences that overall tall buildings are not generating fast track, affordable housing and that there is the potential to design out affordable housing as the additional costs of construction and maintenance reduce the surplus available for delivering affordable housing.

- Tall buildings are not delivering the kind of housing needed to address housing shortages in Southwark, instead bringing forward a surplus of 1 and 2 bedded properties.

- Tall buildings are not carbon neutral. Southwark has pledged to become a carbon neutral Borough by 2030 in line with the Mayor of London's aspirations. Tall buildings are in conflict with this and contradict NSP policies Healthy, Active Lives and Best Start in Life.

- Levitt Bernstein, a UK leading expert in housing design and construction submitted recent evidence on the London Plan to the GLA in relation to tall buildings and stated the following:

"We are very concerned by the recent proliferation of tall buildings, particularly the increase in residential towers. Such an increase in high rise residential buildings also takes us into uncharted territory in terms of their long-term environmental and social

ensure that there is a clear plan-led approach to constructing tall buildings. The background and research paper also discusses how 'appropriate, sensitive and in appropriate locations' have been identified. 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.

The temporary loss of housing is with the intention of providing a long-term increased capacity of housing stock, including affordable and socially-rented. Where the council has demolished affordable housing, where viable, we will seek to replace this like-for-like or else increase the level of affordable housing. In a number of instances, estate regeneration has been required due to the quality of the existing housing stock which is not considered fit for purpose.

The Council Plan 2018/19-2021/22 sets commitments for the borough. This includes introducing ballots on any new estate regeneration and a Consultation Charter to ensure local residents can hold private sector developers to account. The ballot system has been introduced for new estate regeneration as has a draft Developer's Charter which ensures developers clearly set out how they have addressed residents' and stakeholders' concerns. The Developer's Charter forms part of our updated Statement of Community Involvement, which will clearly inform residents on how we plan to consult and how they can get involved in directing planning.

Further to this it should also be acknowledged that this document and its policies must be read as a whole and that tall building development will be assessed against all policies in the NSP.

impacts. There are relatively few precedents when it comes to major refurbishment. Historically, new build high-rise blocks have tended to be in council ownership and flats have been rented albeit with some leaseholders as a result of Right to Buy. This has made it possible to decant residents where major work is needed; Park Hill in Sheffield is a good example. This is much more difficult when flats are sold. It will be almost impossible to empty a private tower block when major work is needed 20-40 years on. The risk is that they fall into gradual decline with only urgent repairs carried out on an ad hoc, piecemeal basis. As the building degrades, people will leave. Those who remain may find it hard to sell and/or find themselves in negative equity, and service charges may no longer cover costs. We know that physical decline is linked to social and economic decline; in promoting tall buildings (which is effectively what is happening) the GLA should be mindful of the long-term social and practical implications, particularly as tall buildings are inevitably also visually dominant.

The evidence of experts in this matter should be given due weight.

- This Policy can be made sound. There are alternative means of achieving population density, avoiding urban sprawl and increasing activities and life opportunities for nearby residents. Some of the highest levels of population density in London are in Westminster and Kensington and Chelsea. These Boroughs rarely have residential buildings above 8 storeys. Whilst this does not achieve the density of the very tallest buildings they are carbon neutral, family friendly and avoid the unpleasant environmental effects associated with tall buildings. Please note that I would like to speak at the Examination in Public.

Therefore our approach to all affordable housing with the inclusion of tall buildings is to achieve the requirements set out in P1: Social rented and intermediate housing. This is a requirement of 35% affordable housing that is made up of a minimum 25% Social rented housing and a minimum of 10% Intermediate housing.

P69: Energy sets out the minimum standards for all major developments, reducing the carbon dioxide emissions in line with the minimum requirements of the London Plan which includes 100% on 2013 Building Regulations Part L standards for residential development; and a minimum of 40% on 2013 Building Regulations Part L up to 2019, and zero carbon (100%) from 1 January 2019 onward, for non-residential development. This follows governmental guidance which is to procure ambitious targets to minimise Greenhouse gas emissions (Policy S12 of the New London Plan). For development that do not meet these minimum requirements, the council has a carbon offset scheme in place where mitigation of the shortfall against carbon emissions reduction requirements are secured off-site through financial contributions. The provision of tall buildings and their subsequent phasing plans, regardless of when construction commences, will be subject to these policies. This ensures that new development in the borough meets the highest energy standards to help us meet targets moving towards Carbon neutrality by 2030.

Carbon offset funds are released by the Council incrementally and through approval by planning committee, to ensure that the impacts of the spending of offset money most effectively contributes to the wellbeing of our communities and in line with the Council's targets for sustainable development. The designation of carbon offset funds through planning committee, which are open to public engagement and available to view online.

Organisation Friends of Nunhead Cemetery
NSPPSV366

I am content in principle that the policy on tall buildings is appropriate and to be welcomed. However, I have some concerns that this planning policy may be subjected to undue pressure, by commercial developers, to being watered down. I would expect to see Southwark maintaining the Borough Views towards St Paul's from both Nunhead Cemetery and One Tree Hill very robustly if they are challenged. In particular, the view of London from Nunhead with St Paul's in the background is the subject of a work by JMW Turner in the Tate collection, similar to the GLA London panorama view from Blackheath that a view from Blackheath that was also painted by Turner. As noted above, the protection of the Borough Views from challenge is very important. Tall buildings should be refused robustly where they obstruct these views and are out of keeping with the character of adjacent streets and buildings, particularly near conservation areas and listed buildings.

Supportive representation noted.

Individual
NSPPSV95

Impacts on the public realm are not dealt with adequately to safeguard the quality and safety of the public realm, particularly environmental impacts such as wind and shade.

Tall buildings need to create meaningful new public realm to support all the additional people that will be using it - for circulation and socialising, and for well being.

Basements associated with tall buildings often sterilise the opportunities for public realm by limiting the life of planting, particularly if the proposals aren't fully detailed prior to consent. All mitigation for environmental impacts to be fully resolved and detailed within the proposals submitted for planning to ensure that the proposed mitigation is viable.

All mitigation for wind to be addressed strictly on site.

New building lines to be pulled back to provide new public realm and to create wider footpaths to accommodate the increased pedestrian flows generated by increasing density.

Representation noted. P14 is considered compliant with the Mayor's adopted London Plan (2016) and the emerging draft New London Plan, as the workings of our plan-led approach is set out in the emerging Tall buildings background and research paper with an urban context evaluation section mapping out constraints within the Borough. Further to this specific site allocations have been identified to anticipate tall building development within the guidance section to ensure that there is a clear plan-led approach to constructing tall buildings. The background and research paper also discusses how 'appropriate, sensitive and in appropriate locations' have been identified. 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.

Open spaces and biodiversity have been evaluated in our Open Spaces background paper submitted as part of the plan. Any

New street trees to be planted into ground (not planters or over basement) with soil volumes to ensure the long term viability of the canopy cover. Trees in planters have a limited life span and trees over basement are limited to the life of the building, perhaps as little as 60 years.
Soft and hard landscape proposals to be fully detailed within the proposals submitted for planning to ensure that the proposals are fully deliverable.

Individual
NSPPSV373

This policy is not positively prepared because to say that “tall buildings are significantly higher than surrounding buildings” does not justify a ratio of ten times higher. This is the height for which planning permissions are being given on the Old Kent Road and which, presumably, this policy is seeking to justify. The buildings being approved, even before this policy is adopted, are unwanted, alien, ugly eye sores; monuments to greed, arrogance and gullibility. Tall buildings are limited to 2-2½ times the height of most buildings in the surrounding area. They should only be located where an adjacent road or open space is large enough to benefit from the change in scale and the surrounding urban fabric is able to benefit from the increase in population.

I would suggest this policy also contravenes the NPPF 2018 which seeks sustainable development. 45-50 storey buildings cannot be sustainable either in construction or in use. They can only ever be energy consumers, whether they are built in Core Areas or elsewhere.

This policy is not positively prepared because paragraphs have been omitted without identifying the fact in the amended policy. Reference to “Guidance on tall buildings” from CABE & English Heritage has been removed. This may have been written in 2007 but remains a useful external guide for evaluating the suitability of tall buildings and more useful than Historic England’s 2015 version.

The City of London takes years of consultations and discussion before it allows any

current deficiency in open space has been directly addressed as part of this research. P56 Open space sets out the protection of existing designated MOL, BOL and OOS and P58: Green infrastructure indicates that “large-scale development must provide new publically accessible open space and green links”. This is to ensure that all new development satisfactorily account for an increase in population and improve their access to open space.

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Heritage-led regeneration is a concept in support of Policy 7.9 of the adopted London Plan, which states:

“A. Regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration. This includes buildings, landscape features, views, Blue Ribbon Network and public realm.”

B. The significance of heritage assets should be assessed when development is proposed and schemes designed so that the

towers to be built within the Square Mile. This is because it takes the impact of tall buildings very seriously. Southwark slips through permissions for at least three towers almost as high as the Gherkin with minimal local notice and no wider discussion at all. The draft Old Kent Road AAP does not talk about 45-50 storey towers; it talked about over 30 storey in a few key positions. I would expect this suggestion to have been heavily condemned in the consultation responses which, after 12 months, have still not seen the light of day. This policy is ineffective and not positively prepared because it intends to inflict similarly vast towers on other parts of the Borough and on current form will tell as few people as possible about them until they have been given planning permission.

heritage significance is recognised both in their own right and as catalysts for regeneration. Wherever possible heritage assets (including buildings at risk) should be repaired, restored and put to a suitable and viable use that is consistent with their conservation and the establishment and maintenance of sustainable communities and economic vitality

C. Boroughs should support the principles of heritage-led regeneration in LDF policies”.

SP2 therefore supports the adopted London Plan through the incorporation of heritage-led regeneration, and is sound. It should be noted that all policies in the NSP are intended to be regarded as a whole, meaning there may be some cross-over between different Strategic Policies.

Individual
NSPPSV97

I wish to make the following comments on the proposed New Southwark Plan (amended) on two specific policies; Policy SP2: Regeneration that Works for All and P14: Tall Buildings, in addition to the two policies commented on in the earlier round of consultation on the Submission Version of the New Southwark Plan, P17: Conservation Areas and NSP75: Aylesham Centre and Peckham Bus Station (copied below for convenience).

Policy P14: Tall Buildings is unsound because:

- it is not consistent with national and regional planning policy.

The Current London Plan (2016) and Draft London Plan require that “Tall buildings should be part of a plan-led approach to changing or developing an area”, yet all

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restrictions on the height and location of tall buildings have been removed from the NSP and replaced with vague sentences such as we “use a number of criteria to determine applications”. I welcome the change in the amended policy to include a map however, the words “where we expect tall buildings” are not strong enough to stop tall buildings in other areas, where they may not be appropriate.

The National Planning Policy Framework paragraph 155 states the need for “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses” to reflect a “collective vision”. However, it has become clear through the petitions (referred to above) and the public consultation work that Peckham Citizens has undertaken that the vast majority of local people are unaware of this policy, and when made aware, do not agree with it. Hence it does not reflect the prevailing local opinion or a “collective vision”.

The Mayor has also stated that “higher densities can be achieved through a range of building design, including courtyard blocks and mid-rise building” and that development should respond to character and context.

The Local Plans Expert Group which reported to the Government last year recommended the use of “propositional planning” methods which give greater three dimensional information about the form of new developments and help to explain “the consequences of proposed plans in order to stimulate easier engagement”.

The latest Housing White Paper says that it is important “that people have a say over where new homes go and what they look like through the planning process”.

Responding to this, New London Architecture’s London Tall Buildings Survey states “If people are to have a say, then they need to be given a clear idea of what is proposed and the impact it will have on the places where they live and work.”

This policy is not consistent with national and regional planning policy.

-it is not justified.

All specific restrictions on the location and height of tall buildings have been removed from the NSP Proposed Submission Version (apart from in the site specific policies)

Community consultation during the preparation of the New Southwark Plan has been informed by the Southwark Statement of Community Involvement. This document (SCI) sets out how the council will ensure that local communities, residents, businesses and other stakeholders can be involved in local planning decisions the and preparation of regeneration and planning strategies to help to shape the places in our Borough. This document has recently been revised and a new version will be adopted in early 2020. During the preparation of the New Southwark Plan, we held over 85 consultation events in over 59 locations and we sought to engage as much as the community as possible. Further details relating to consultation can be found in the consultation report.

Social regeneration charters are currently in the process of being developed throughout the borough. These will be designated to all of the opportunity areas in the borough and they function to align the communities’ priorities and visions for the future of their area and encompass their targets for sustainable development. This will help guide distribution of CIL funds and ensure that allocation of funds is optimum to what has been identified as providing the most benefit to our communities. This aligns the council’s desires with our communities’ and makes the most of the funds received from developers as part of the regeneration process.

which will open the door to the argument of precedence alongside existing or proposed tall buildings covered by site specific policies. The effect will be that clusters of tall buildings can be developed around a site with a site specific policy that had intended to allow just one tall building. There is a significant danger that this will happen on and around the Aylesham Centre and Peckham Bus Station site.

If clusters are to be encouraged around existing tall buildings then this is a significant change in policy and has not been widely publicised or consulted on therefore it is not justified.

The NSP states (pg 42) that “Tall buildings ... can be an important component in contributing to Southwark’s physical regeneration, raising population density, avoiding urban sprawl and increasing the activities and life opportunities on offer for nearby residents.” This is not proven, in fact a growing body of recent research is summarised in the White Paper on The Impacts of Tall Buildings: A Research Summary, 2015, by Michael Mehaffy, Sustasis Foundation, Delft University of Technology (attached). It shows tall buildings have detrimental effects on the surrounding area and the environment through:

- shading,
- creating wind tunnels and ‘shadows’ that are notoriously hard to predict or mitigate once in place,
- higher energy use, embodied energy and maintenance costs,
- a detrimental impact on small-scale entrepreneurial activity,
- lack of external amenity space and ‘doorstep play’ areas which make them unsuitable for families,
- overlooking and loss of privacy for the existing surrounding buildings, including several streets of two and three storey houses that will be directly adjacent and their private outdoor space easily visible,
- a loss of ‘sky’ for pedestrians, loss of views for the users of nearby buildings and the creation of a feeling of being loomed over can significantly degrade the experience of the public realm and quality of place,
- isolation from the ground making the surrounding area feel less safe and enlivened,
- segregating the wider community by income; essentially becoming a gated

community in the sky which limits interaction and social capital across socio-economic groups.

The House of Commons (2001) report: Tall Buildings: Report and Proceedings of the house of Commons Transport, Local Government and the Regions Committee found that “The main reason that the Committee held an inquiry into tall buildings was to identify the contribution which they can make to the urban renaissance. We found that contribution to be very limited. The proposition that tall buildings are necessary to prevent suburban sprawl is impossible to sustain. They do not necessarily achieve higher densities than mid or low-rise development and in some cases are a less-efficient use of space than alternatives. They have, for the most part, the advantages and disadvantages of other high density buildings. They can be energy efficient*, they can be part of mixed-use schemes and they can encourage the use of public transport where there is spare capacity, but so can other types of high density developments. Tall buildings are more often about power, prestige, status and aesthetics than efficient development.”

*Note: more recent research is showing that this is not correct in the London climate, for example refer to the research by Philip Steadman (Emeritus Professor of Urban and Built form Studies and Research Fellow UCL).

-it is not effective.

If clusters of tall buildings are not intended to be allowed alongside existing or proposed tall buildings covered by site specific policies then this policy is not effective as it does not have any specific measures to control this possibility.

As the guidance for the location and height of tall buildings has been removed from the NSP, there is now no effective guidance to how the height and location of tall buildings should be assessed.

-it is not positively prepared.

The statement “We have taken a consistent approach when planning for tall buildings and use a number of criteria to determine applications” in policy P14 is unfit for purpose as it is too vague to form a meaningful guidance for when tall buildings will be appropriate and does not reflect that this is a significant change to the existing policy.

This policy therefore does not meet the test for being positively prepared. • The specific sites where tall buildings might be appropriate should be identified with a full description of the height, massing and type of building that would be acceptable, and this should be widely and extensively publicly consulted on so that the local community has the over-riding say in whether tall buildings should be permitted.

- Revise the policy in line with recent research that challenges the principle that tall buildings increase density and help regeneration, or justify why this has not been done/is not appropriate.
- All other areas in Map 1 should be specified as not appropriate for tall buildings, unless separate, extensive public consultation that makes the scale of the change clear, is undertaken and widely publicised by the council on a case by case basis.
- Define what a ‘tall building’ is in line with the National Planning Policy Framework including the New Draft London Plan Policy D8 part A.
- Publish the “range of views” on tall buildings that have been gathered in the council’s consultation process (referred to in the Consultation Report) and quantify the numbers of people for, neutral, and against. This should be considered alongside the petitions that have recently gained thousands of signatures against towers.

it is not effective.

This policy is often compromised by the need for housing in the borough and should be strengthened if it is to have any meaning at all. The need for housing is real and important, and the individual circumstances of each site need to be assessed. Where a

proposed development conflicts with the existing character of a conservation area (for example by being different to the prevailing height or massing) then it would be appropriate for a greater level of scrutiny and public consultation to be required.

Changes that would make the policy sound include:

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

Individual
NSPPSV377

This is a formal response to the amended Southwark Plan. I refer to Policy P14 on Tall Buildings.

There has been a huge increase in the development of very tall buildings in London & Southwark over the last 10-15 years and this is still continuing. Many of them are in inappropriate places ie are not located at major transport nodes/hubs and do not reflect the local vernacular or building heights in the immediate neighbourhood.

I am therefore supporting the objection to this policy submitted by Lynn Stephenson on behalf of the WWTRA on Policy P14.

In Camberwell recent residential development has been generally between 3-5 stories, especially around the Green and this scale, massing and density is acceptable.

Developers are however beginning to push the boundaries of acceptability in the area by including single blocks well over 5 stories...some as high as 10-12...if allowed these schemes will set a precedent which will seriously affect the character of Camberwell and surrounding areas.

London in the future will rue the development of so many very high buildings outside of very particular places like the City, Canary Wharf, etc. It is time to call a halt and have a policy London wide and locally in the case of Southwark which reflects location, character, history, massing and conservation especially set in the context of global warming and the need to reduce our carbon footprint and encourage public transport.

P14 is considered compliant with the Mayor's adopted London Plan (2016) and the emerging draft New London Plan, as the workings of our plan-led approach is set out in the emerging Tall buildings background and research paper with an urban design evaluation section mapping out constraints within the Borough. The background and research paper also discusses how 'appropriate, sensitive and in appropriate locations' have been identified. Further to this specific site allocations have been identified to anticipate tall building development within the guidance section to ensure that there is a clear plan-led approach to constructing tall buildings. 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.

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.

In addition to this site locations are being updated to clearly set

	<p>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.</p>
<p>Organisation: Alvey TRA NSPPSV379</p> <p>Plan should not include tall buildings as they create wind tunnels in otherwise nice areas.</p>	<p>Representation noted. Mitigation against environmental impacts such as wind sheer is covered in policy P14, now clarified as point 3.3.</p>
<p>Organisation: Liam Hennessy Architects NSPPSV380</p> <p>"[Strata] - Castle House Planning and Design Statement: Hamilton associates, nov 2005.</p> <p>"The opportunity now exists to create a Development that sets a standard for design quality for the future regeneration of the Elephant & Castle." "Planning policy requires tall buildings to be of the highest architectural quality and this is embodied in every facet of the design including proposed materials and finishes."</p> <p>Existing Saved Southwark Plan Policy 3.20 – Tall buildings: "Any building over 30 metres tall should ensure that it is of the highest architectural standard."; "Planning policy requires tall buildings to be of the highest architectural quality".</p> <p>Result: "Britain's ugliest new building" Strata tower, winner of the Carbuncle Cup 2010, in recognition of its "plain visual grotesqueness".</p> <p>Amended Policy P14 proposes that tall buildings should "be of exemplary architectural</p>	<p>P14 is considered compliant with the Mayor's adopted London Plan (2016) and the emerging draft New London Plan, as the workings of our plan-led approach is set out in the emerging Tall buildings background and research paper with an urban context evaluation section mapping out constraints within the Borough. Further to this specific site allocations have been identified to anticipate tall building development within the guidance section to ensure that there is a clear plan-led approach to constructing tall buildings. The background and research paper also discusses how 'appropriate, sensitive and in appropriate locations' have been identified. 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.</p> <p>Community consultation during the preparation of the New Southwark Plan has been informed by the Southwark Statement of Community Involvement. This document (SCI) sets out how the council will ensure that local communities, residents, businesses and other stakeholders can be involved in local planning decisions the and preparation of regeneration and planning strategies to help to shape the places in our Borough. This document has</p>

design” and “thoughtfully designed to an exemplary standard”.

This proposed Policy is Unsound as it is manifestly not effective.

Neither Southwark Planners nor the Design Review Panel are capable of ensuring architecture of an “exemplary standard”: in addition to the seriously ugly Strata building – winner of the Carbuncle Cup in recognition of its contribution to ugliness, the mediocre to poor architectural quality of the new buildings in Elephant Park, even further proof is provided by the 15 storey tower on Aylesbury Plot 18 which has been nicknamed The Thug in recognition of its ‘contribution’ to the architecture and urban realm of the Liverpool Grove Conservation Area. Maybe The Thug could be a contender - on a future list competing for the Carbuncle Cup – Britain’s Ugliest new building?

Aylesbury Area Action Plan 2010 chapter 4. Public Life: Better and safer streets, squares and parks. PL4 Buildings heights: “one district landmark building of between 15 and 20 storeys at the junction of Thurlow Street and Albany Road”, “(3) local landmark buildings of between 10 and 15 storeys to mark the entrances to Portland Street, the King William IV and Chumleigh green fingers”. Aylesbury Area Action Plan proposal: 4 towers along Albany Road, and 3 green fingers.

Reality now facing Burgess Park, literally: 8 fingers: 4 x 2 fingers - towers - to Burgess Park and its users, 0 green fingers.

Amended Policy P14 proposes that “tall buildings will be required to: 2.6 Avoid unacceptable harm to the significance of heritage assets or their settings;

and 2.8 Have a positive relationship with the public realm,”

This proposed Policy is Unsound as it is manifestly not effective.

recently been revised and a new version will be adopted in early 2020. During the preparation of the New Southwark Plan, we held over 85 consultation events in over 59 locations and we sought to engage as much as the community as possible. Further details relating to consultation can be found in the consultation report.

Neither Southwark Planners nor the Design Review Panel are capable of ensuring that towers avoid harm to the significance of heritage assets or their settings, and have a positive relationship with the public realm: the Urban Vandalism of the 15 storey Thug tower on Aylesbury Plot 18 is vivid proof – directly harming Liverpool Grove Conservation Area, and in direct conflict with Policies 3.15 and 3.18 intended to protect heritage assets and their settings. The eight towers (above 10 storey) proposed for Albany Road will necessarily harm the heritage asset of Burgess Park by diminishing its amenity value as tall towers cannot be screened. With very careful planning and planting, and several decades of time, 10 storey buildings outside the perimeter of the park can be screened.

Southwark Council's Planners have several times ignored the Aylesbury Area Action Plan: it proposed 1 district landmark building along Albany Road – 2 are now planned; it proposed 2 towers of 10 to 15 storeys on the First Development Site – 3 towers are now planned, one 14, one 18 and one 20 storeys, so the number of towers overall along Albany Road has been doubled, and the heights set out in the Aylesbury Action Plan ignored; the AAAP proposed 3 green fingers connecting Burgess Park with the Aylesbury Estate – 0 green fingers are now planned. Southwark Council's Planners are already causing severe harm to the significance of heritage assets and their settings: Burgess Park and Liverpool Grove Conservation Area by approving schemes and proposals in direct conflict with Policies intended to protect heritage assets and their settings. The intention to increase the density in the Aylesbury Area Vision will create an even more explicit free-for-all than the current planning free-for-all where Policies and plans are ignored. The proposed Policy P14 Tall buildings is therefore Unsound as it is not effective.

For the record: the 8 proposed towers are 100% for private sale – replacing lower buildings facing Burgess Park that were designed and built as 100% for social housing tenants.

Buildings of 9, 10, 11 storeys are 'everywhere' in London, especially in high density areas such as Bayswater, Bloomsbury, Mayfair, Knightsbridge, Sloane Avenue, Pimlico Road, Westminster generally, and Kensington and Chelsea. There are new examples too such as the 10 storey residential building on the Old Kent Road, beside Aldi.

10 storey buildings can be screened from a park. Good examples of 10 storey, approx, buildings that don't harm the adjacent parks are the fine apartment buildings along Prince Albert Road on the north side of Regents Park; on Bayswater Road on the north side of Kensington Gardens; and the buildings along Piccadilly on the north side of The Green Park.

Anyone hoping to plan high density buildings that don't harm our urban realm would do well to follow the Latin word of exhortation: "Circumspice". It means 'look around'.

The proposed Policy P14 Tall buildings is Unsound as it is not effective in protecting our heritage assets.

Amended Policy P14 proposes that "tall buildings will be required to: 2.6 Avoid unacceptable harm to the significance of heritage assets or their settings; and 2.8 Have a positive relationship with the public realm,"

The harm proposed for Burgess Park from the 10 storey building at 21-23 Parkhouse Street is more than unacceptable harm, it is severe and permanent harm for a Site of Importance for Nature Conservation. It is also an exceptionally bad precedent for development at the southern boundary of Burgess Park: another 10 storey building has already been proposed for a neighbouring site on Parkhouse Street. The prospect of large areas of Burgess Park being permanently harmed by overshadowing from tall buildings is real and acute.

Southwark Planners are not ensuring that tall buildings avoid "harm to the significance

of heritage assets or their settings, and have a positive relationship with the public realm”:

This proposed Policy P14 is therefore Unsound as it is not effective.

My own Burgess Park overshadowing studies – results taken for all daylight hours on the 21st of each of 6 months from the autumn equinox 21st September, to the spring equinox on the 21st March - from proposed 10 storey (30 metre) building at 21-23 Parkhouse Street. The studies demonstrate that:

a 10 storey building at the southern boundary of Burgess Park creates a minimum shadow of 36 metres every day for all of 6 months of the year.

a 10 storey building at the southern boundary of Burgess Park creates an average shadow of 100 metres every day for all of 4 months of the year.

In 2017 Southwark Council submitted a planning application for a 9 storey building at the same address, 21-23 Parkhouse Street, that it later withdrew. The 2017 application, reference 17/AP/1723 – was sent to the GLA Planning Unit for review. The 12 page review of the proposal for a 9 storey building describes “Burgess Park (designated Metropolitan Open Land and Site of Importance for Nature Conservation (Grade 2)) to the south. Burgess Park is to the north, not to the south, of 21-23 Parkhouse Street. Critically, the GLA Report – even though it has paragraphs titled “Urban Design and tall buildings” and “Height and Massing” makes not one single mention of either the overshadowing or overlooking of ‘protected’ Metropolitan Open Land and Site of Importance for Nature Conservation. A 9 or 10 storey building at the southern boundary of Burgess Park will necessarily result in major overshadowing, as my overshadowing studies prove, and therefore cause significant harm to a Site of

Importance for Nature Conservation. By making not one single reference to the protection of a major heritage asset, the GLA Planning Unit's Report on 21-23 Parkhouse Street is disgracefully unprofessional. This clearly illustrates that proposed Policy P14 Tall buildings is Unsound as it is not effective in protecting our heritage assets, which are of the highest importance.

The overshadowing studies for a 10 storey building at 21-23 Parkhouse Street give the following results for average overshadowing throughout the day, even excluding the high value results soon after dawn and before sunset: 21st September: 65 metres; 21st October: 84 metres; 21st November: 133 metres; 21st December: 184 metres; 21st January: 133 metres; 21st February: 100 metres; 21st March: 65 metres. So the average overshadowing for all of the 6 winter months from the autumn equinox on the 21st September to the spring equinox on the 21st March is 109 metres.

The architects' document submitted with the planning application for 21-23 Parkhouse Street – titled "Daylight, Sunlight and Overshadowing" states, in the Executive Summary (see next page) quote:

"There will be no impact in terms of daylight, sunlight and overshadowing as a result of the proposed development." The applicant is Southwark Council.

This clearly illustrates that proposed Policy P14 Tall buildings is Unsound as it is not effective in protecting our heritage assets, which are of the highest importance.

The proposed Aylesbury Area Vision proposes an open ended increase in density. Southwark Planners have already approved severe harm to Burgess Park. With an increase in density on the Aylesbury, the possibility of having many more towers and/or towers of increased height overlooking Burgess Park is real and imminent.

An increase in density is acceptable and achievable without harming Burgess Park: the lower buildings of 5 or 6 storeys proposed along Albany Road, for example, can be increased to 10 storeys. Buildings of 10 storeys can be screened from the park - thereby preserving its amenity value - but not towers of 15 or 20 storeys.

The proposed Policy P14 Tall buildings is Unsound as it is not effective in protecting our heritage assets. Southwark Council Planners are paid to present Policies and proposals that are positively prepared, that are justified, and that are effective.

I am not paid to present Policies and proposals that are positively prepared, that are justified, and that are effective.

But an outline of how Amended Policy P14 Tall buildings could be made Sound would be for

1. Current Southwark Planners should resign, so that competent people who are capable of doing the job can take their place: Planners who know the difference between urban planning and urban vandalism; Planners who are capable of writing honest, truthful, and complete reports for Planning Committees and not Reports clouded with deceit; and Planners who know the difference between urban planning and greed.
2. Planners to learn that the Aylesbury so-called regeneration is one of the most destructive schemes in the history of the United Kingdom. An argument can be made that it is the most destructive, ever: it is seriously destructive for people and for our urban realm. Indeed it is so destructive that it is not an exaggeration to say that it is an abusive scheme. If the Planners learn that, accept that and believe it, they will have made a start.
3. Planners to learn what the meaning of 'harm' is to the significance of heritage assets and/or their settings.

4. From their recent disgraceful conduct in relation to Burgess Park (Aylesbury First Development Site) and Liverpool Grove Conservation Area (Aylesbury Plot 18), planners operating in the context of an approved Plan – such as the Aylesbury Area Action Plan – must get the express APPROVAL of local residents and local groups that are consulted for significant deviations from the approved documents. If not, having approved documents is meaningless. Significant deviations should be taken to mean changes to the setting of any buildings - as happened with the severe harm being caused to the Liverpool Grove Conservation Area by the Plot 18 changes; and to mean changes to the heights of buildings or to the number and distribution of tall buildings – as happened with the severe harm being caused to Burgess Park by the increase in number and heights of tall buildings, TOWERS, overlooking the park and thereby necessarily diminishing Burgess Park's Amenity Value. The number of towers was increased from 4 to 8 – directly contradicting the Aylesbury Area Action Plan.

5. Large numbers of people objecting to proposals, and very few approving of proposals, as happened in the case of the Heygate regeneration, the Aylesbury regeneration, the Aylesbury First Development Site, Aylesbury Plot 18, etc, etc, should be regarded very seriously by planners, unlike at present where regardless of how many people object, the planners think they know better, and are prepared to force seriously destructive schemes that are both abusive and abusing on local residents and our urban realm.

6. Planners to learn that increased density in urban planning doesn't lead to building towers. It is something they should have learned in their first year in Planning school.

7. Planners to learn that buildings up to 10 storeys tall on roads outside the perimeter of a park can be successfully screened – with careful planning, planting, and decades of time - but that 15 or 20 storey towers, or taller, cannot be screened. There are numerous successful and unsuccessful examples around London. One way to learn this: look around you.

8. Planners to learn what Amenity means in relation to urban realm, public space, and parks. It is clear that Southwark Planners are clueless when it comes to the amenity

value of something so important as the amenity value of Burgess Park. The amenity of Burgess Park was never once mentioned in the Planning Officer's Report on the appalling towers on the Aylesbury First Development Site that are in MAJOR BREACH of the Aylesbury Area Action Plan. Not mentioning the huge loss of Burgess Park's amenity in the Planning Officer's Report makes that Report both highly unprofessional and a disgrace. Not mentioning the huge harm to Liverpool Grove Conservation Area in the 111 page Planning Officer's Report makes that Report – another Southwark Planner's Report - both highly unprofessional and a disgrace. Southwark Council Planners are paid to present Policies and proposals that are positively prepared, that are justified, and that are effective.

I am not paid to present Policies and proposals that are positively prepared, that are justified, and that are effective.

But an outline of how Policy 'P9 optimising delivery of new homes' could be made Sound would be for

1. Current Southwark Planners should resign, so that competent people who are capable of doing the job can take their place: Planners who know, understand, and respect what public amenity means; Planners who know the difference between urban planning and urban vandalism; Planners who are capable of writing honest, truthful, and complete reports for Planning Committees and not Reports clouded with deceit; and Planners who know the difference between urban planning and greed.
2. Planners who know, understand, and respect what public amenity means. Planners who understand the value of our heritage assets such as Burgess Park and Liverpool Grove Conservation Area. It is very clear that the current Planners do not respect our heritage assets including even Burgess Park. In addition to the disgraceful proposals for towers on the north side overlooking Burgess Park – in direct conflict with the Aylesbury Area Action Plan - the current example of the proposed 10 storey building at 21-23 Parkhouse Street (planning reference 19/AP/0469) at the southern boundary of the park, which will cause MAJOR overshadowing of Burgess Park – a Site of Importance for Nature Conservation (SINC) – is yet another clear example of Southwark

Council Planners' contempt for our heritage assets, including assets of London-wide importance, namely Burgess Park. It is a seriously disgraceful and abusive proposal from people who are paid to protect our heritage assets, and not directly abuse them.

The honourable thing for the Planners to do would be to resign."

Organisation: Liam Hennessy Architects

NSPPSV380

This representation details a critique of architectural quality, concerns about tall buildings near Albany Road and shadows from tall buildings. Please refer to the full email representation to comment on.

P14 is considered compliant with the Mayor's adopted London Plan (2016) and the emerging draft New London Plan, as the workings of our plan-led approach is set out in the emerging Tall buildings background and research paper with an urban context evaluation section mapping out constraints within the Borough. Further to this specific site allocations have been identified to anticipate tall building development within the guidance section to ensure that there is a clear plan-led approach to constructing tall buildings. The background and research paper also discusses how 'appropriate, sensitive and in appropriate locations' have been identified. 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.

Representation noted. Tall building development will be assessed against all policies in the NSP, including policy P54: Protection of amenity which provides guidance on how to mitigate impacts related to daylight and sunlight. It should be acknowledged that the NSP and its policies must be read as a whole. Site allocations that have been designated to anticipate tall buildings have been strategically assessed through our Sites Methodology Paper. This methodology paper underpins the site vision section to 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.

	<p>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.</p>
<p>Organisation Southwark Clinical Commissioning Group NSPPSV383</p> <p>Southwark Clinical Commissioning Group's response to consultation to the New Southwark Plan Proposed Submission version: Amended Policies 2019</p> <p>Thank you for consulting Southwark CCG on the 2019 amended policies to the New Southwark Plan Proposed Submission version. This response has been prepared by the NHS London Healthy Urban Development Unit on behalf of the CCG following detailed discussions. We very much see this as part of our ongoing engagement between the CCG, other health partners and the Council.</p> <p>We propose an additional clause to this policy "The design of tall buildings will be required to.. Minimise the risk of suicide/promote suicide prevention through its design and appropriate use of lighting, physical barriers and signage." The Preventing Suicides in Southwark Strategy and Action Plan 2017 includes as its third point "3.Prevention of suicide in high risk locations and reducing access to the means of suicide". The supporting text to the policy could make reference to this strategy and to the Public Health England Guidance Preventing Suicide in Public Places.</p>	<p>P14 is considered compliant with the Mayor's adopted London Plan (2016) and the emerging draft New London Plan, as the workings of our plan-led approach is set out in the emerging Tall buildings background and research paper with an urban context evaluation section mapping out constraints within the Borough. Further to this specific site allocations have been identified to anticipate tall building development within the guidance section to ensure that there is a clear plan-led approach to constructing tall buildings. The background and research paper also discusses how 'appropriate, sensitive and in appropriate locations' have been identified. 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.</p> <p>Social regeneration charters are currently in the process of being developed throughout the borough. These will be designated to all of the opportunity areas in the borough and they function to align the communities' priorities and visions for the future of their area and encompass their targets for sustainable development. This will help guide distribution of CIL funds and ensure that allocation of funds is optimum to what has been identified as providing the most benefit to our communities. This aligns the council's desires with our communities' and makes the most of the funds received from developers as part of the regeneration process.</p>
<p>Individual</p>	<p>Noted.</p>

<p>NSPPSV384</p> <p>same as before</p>	
<p>Individual NSPPSV394</p> <p>We are writing in regards to an exhibition hosted by a local community group to the Councils proposals to the designated area at the junction of Bermondsey St and St Thomas St. as an area for high-development.</p> <p>We would like to say as a local resident of more than 15 years to the area we are deeply concerned by the radical intervention into the local environment is subject to such poor consultation process with local business and residents. We strongly object to these plans as an area of such high-rise zone development that is completely inappropriate for the near by local Bermondsey conservation area given its architecture and heritage. From viewing the plans it appears that the Council is looking to accommodate specific private developers by designating sites in their ownership for exceptionally high density and environmentally insensitive redevelopment. Firstly we strongly object to the view that sites in Bermondsey Street, as being remotely suitable for high-rise development is completely inappropriate due it being a conservation area.</p>	<p>Representation noted. Site allocations that have been designated to anticipate tall buildings have been strategically assessed through our Sites Methodology Paper. This methodology paper underpins the site vision section to 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.</p> <p>Community consultation during the preparation of the New Southwark Plan has been informed by the Southwark Statement of Community Involvement. This document (SCI) sets out how the council will ensure that local communities, residents, businesses and other stakeholders can be involved in local planning decisions the and preparation of regeneration and planning strategies to help to shape the places in our Borough. This document has recently been revised and a new version will be adopted in early 2020. During the preparation of the New Southwark Plan, we held over 85 consultation events in over 59 locations and we sought to engage as much as the community as possible. Further details relating to consultation can be found in the consultation report.</p>
<p>Individual NSPPSV395</p> <p>We believe that the amendment to the Tall Buildings policy is not justified as it lacks definition and therefore open to subjectivity. There is no definition regarding what a major development is, nor a definition for a largescale major development. There are no definitions regarding the minimum standards required for a major development; there are statements to this effect for the Old Kent Road Area Action Plan, but not for other large developments. There is no definition provided for what is 'significantly</p>	<p>P14 is considered compliant with the Mayor's adopted London Plan (2016) and the emerging draft New London Plan, as the workings of our plan-led approach is set out in the emerging Tall buildings background and research paper with an urban design evaluation section mapping out constraints within the Borough. The background and research paper also discusses how 'appropriate, sensitive and in appropriate locations' have been identified. Further to this specific site allocations have been identified to anticipate tall building development within the</p>

higher' nor what is the 'emerging context'. How are excellent quality living conditions defined? Does this refer to living conditions in an apartment or living conditions in a tall building with no connection to the environment?

We believe it is also not justified as it lacks a published evidence base. The document refers to a revised research report on tall buildings, but this has not been published. There is also considerable evidence regarding the detrimental effects on the health and wellbeing of individuals living in and near tall buildings, this is not referred to.

We believe that the amendment to the Tall Buildings policy is not consistent as the New London Plan requires a design review and this is not referenced in the proposed plan. A tall buildings background research paper should be published.

The policy should:

- explain how Southwark takes a plan-led approach to tall buildings, and how 'appropriate, sensitive and inappropriate locations' will be assessed.
- define what is meant by 'tall building' and identify the general building heights that would be appropriate
- define what is meant by 'context'
- define what is meant by 'emerging context'
- clearly state that tall buildings would be sensitive in areas where they might have a negative impact on the setting and views of public and protected open spaces
- define 'exemplary architectural design' and explain how and by whom 'exemplary' will be assessed
- make it clear that tall buildings will not be allowed near the boundary of Burgess Park.

Paragraph 2.8 should be deleted

Organisation: Alvey estate tenants and leaseholders association (ATLAS) (& liaison with some of neighbouring Kinglake Tra)

NSPPSV396

We have never been asked to accept taller buildings.

guidance section to ensure that there is a clear plan-led approach to constructing tall buildings. 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. The relevant terminology in question can be accessed in the Glossary of the NSP.

Representation noted.

We need a ballot on agenda21/ 2030 Another Legalistic ILLEGAL QUESTION WHICH SEEKS TO IMPOSE AN IDEOLOGICAL SOCIAL CLEANSING NARRATIVE ON SOCIALLY DEPRIVED OR ESTHIC MINORITIES WHO ARE IN REALITY LARGELY EXCLUDED FROM THIS TOP DOWN APPROACH AND HAVE NEVER BEEN ASKED.

OR note when aylesbury est tenants and leaseholders had a ballot in 2000/2001 they voted overwhelmingly NO.

A first step to getting any semblance of fairness is to RECOGNISE THE BALLOT AND SCRAP THE AYLESBURY PLAN WHICH IS ITSELF ILEGAL FOR A NUMBER OF REASONS - mentioned by me in the recent CPO enquiries on Aylesbury estate:

- ballot overruled
- Council decision in 2002 to trash ballot in was illegally conducted because councillors were not informed of certain matters, given false information and lied to by officers.

Organisation: Rhiannon Hughes, Southwark Group of Tenant Organisations (SGTO) NSPPSV400

My name is X, I am writing from Southwark Group of Tenant Organisations (SGTO). We are an umbrella organisation of tenant and residents and the associations that represent them in Southwark. Based at Bells Gardens Community Centre, 19 Buller Close, SE15 6UJ – although we are a borough wide member federation.

We would like to speak at the examination in public on the below points.

I am submitting our NSP response via email in the interest of transparency as a member organisation.

I am objecting to the following points because I do not feel the below points to be legal or sound.

2.7 Currently many Southwark owned estates are serviced by district heating systems, which often fail and leave Southwark tenants and leaseholders without heating and hot water for periods of time. District heating systems are being pushed as the green option for tall buildings it is unsound to further expand district heating systems when the existing ones can't cope and are not having fair investment. However, district heating should be the answer as it is the green option but existing systems should be serviced and CIL from tall buildings contributing to existing systems. Enclosed is a

Representation noted.

Community consultation during the preparation of the New Southwark Plan has been informed by the Southwark Statement of Community Involvement. This document (SCI) sets out how the council will ensure that local communities, residents, businesses and other stakeholders can be involved in local planning decisions the and preparation of regeneration and planning strategies to help to shape the places in our Borough. This document has recently been revised and a new version will be adopted in early 2020. During the preparation of the New Southwark Plan, we held over 85 consultation events in over 59 locations and we sought to engage as much as the community as possible. Further details relating to consultation can be found in the consultation report.

P69: Energy sets out the minimum standards for all major developments, reducing the carbon dioxide emissions in line with the minimum requirements of the London Plan which includes 100% on 2013 Building Regulations Part L standards for residential development; and a minimum of 40% on 2013 Building Regulations Part L up to 2019, and zero carbon (100%) from 1 January 2019

Freedom of Information request made to Southwark Council which details 17,944 instances in which Southwark owned properties experienced heating outages since June 2016 - March 2019. Please note, the 17, 944 are instances reported not properties affected as for many the outages would have affected multiples properties - sometimes 150+ properties are reported together - so the number of properties affected will be far higher than 17,944.

2.7 Language is vague -maximising energy efficiency and prioritise the use of sustainable materials should involve a commitment to being energy efficient and using sustainable materials as out lined in Fuel Poverty Action Group contribution to the New London Plan under district heating and renewable energy.

onward, for non-residential development. This follows governmental guidance which is to procure ambitious targets to minimise Greenhouse gas emissions (Policy SI2 of the New London Plan). For development that do not meet these minimum requirements, the council has a carbon offset scheme in place where mitigation of the shortfall against carbon emissions reduction requirements are secured off-site through financial contributions. The provision of tall buildings and their subsequent phasing plans, regardless of when construction commences, will be subject to these policies. This ensures that new development in the borough meets the highest energy standards to help us meet targets moving towards Carbon neutrality by 2030.

Organisation: Balfour Housing Street Project
NSPPSV173

This submission is made on behalf of members of the Balfour Street Housing Project, a fully mutual co-op of 21 households located directly opposite Trafalgar Place, the first development site undertaken by Lend Lease on the former Heygate Estate site, 5 minutes' walk from the Aylesbury Estate site and the boundary for the Old Kent Road Opportunity Area runs along our street. We are tenants who prevented the demolition of the houses we occupy over 40 years ago and worked with the then Council members and officers to bring them into use. Throughout the life of this Co-op we have played an active role in neighbourhood activities, initiating the development of what is now the Green Flagged Victory Park and Nursery Row Parks and are currently working with officers and members on the Balfour Street improvement scheme. Given the enormous loss of Council housing and the undermining of a sense of community in large parts of this neighbourhood in this neighbourhood we feel the New Southwark Plan (NSP) should do everything possible to redress this.

Definition & Scope

Tall buildings are not defined. They should be.

Paragraph 1 refers simply to areas where they "expect" tall buildings. This is unclear

P14 is considered compliant with the Mayor's adopted London Plan (2016) and the emerging draft New London Plan, as the workings of our plan-led approach is set out in the emerging Tall buildings background and research paper with an urban design evaluation section mapping out constraints within the Borough. The background and research paper also discusses how 'appropriate, sensitive and in appropriate locations' have been identified. Further to this specific site allocations have been identified to anticipate tall building development within the guidance section to ensure that there is a clear plan-led approach to constructing tall buildings. 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.

This policy does adhere with the National Planning Policy Framework, the London Plan and the Mayor's Good Practice Guide to Estate Regeneration (2018) because the Council does ensure that adequate assessment is made before approval of a demolition, that refurbishment of the existing homes would not be

language, and does not clearly indicate whether expect means allow/permit or not. The policy should be clearer and set out: a) the circumstances in which tall buildings will be allowed in the areas set out in Map 1; and b) the conditions which must be satisfied for tall buildings in other parts of the borough – if indeed it is envisaged this is acceptable. Map 1 is too broad and demonstrates a poorly evidenced strategy for tall buildings.

The draft London Plan states in policy D8 at paragraph A that “based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London.” The NSP currently does not provide this level of detail and so is not in conformity with the DLP. The NSP should define a different tall buildings threshold level as appropriate for different areas.

Furthermore, DLP policy D8 paragraph B states that whether locations are appropriate for tall buildings should be determined by the processes required in Policy D2. These processes require in essence an evidence-driven approach to tall buildings strategy. In particular, this policy does not have any consideration for the cumulative impact of tall buildings, despite the requirement to do so set out in policy D8-C-(4) of the draft London Plan.

The NSP should recognise, as the DLP does at paragraph 3.8.1 that “high density does not need to imply high rise”, and that tall buildings should only be acceptable where part of a “plan-led approach to facilitating regeneration opportunities and managing future growth.” Currently, Southwark are proceeding with a plan-free approach with respect to the Old Kent Road and other areas, where tall buildings and arguments about the need for density to deliver borough housing needs are trumping the need to carefully manage and openly scrutinise regeneration strategies.

Tall buildings & Viability

It is crucial the NSP acknowledges that tall buildings must not be allowed to compromise the viability of providing the maximum affordable housing offer which each site can deliver. Viability should be calculated with reference to site, not simply building, as the latter may allow developers to ‘design-out’ affordable housing. Our concern with this negative correlation between building height and affordable housing provision is driven by the Freedom of Information request made to the GLA earlier this year which revealed their own internal studies to have shown such a link, and expressed concern on a London wide basis. This document obtained has been sent

viable in order to achieve the same targeted benefits that the demolition would, whilst following P9: Optimising delivery of new homes and the Residential Design Standards.

Community consultation can be found in our Consultation Summary published on our website. Wider assessment of social and environmental impacts of regeneration so far is undertaken and monitored in our Integrated Impact Assessment, which is a requirement under the Public Sector Equalities Duty (2011) (under section 149 of the Equalities Act 2010). The council carries out Equalities Analysis (EqIA) of its plans, decisions and programmes to consider the potential impact (positive and negative) of proposals on the key ‘protected characteristics’ in the Equality Act 2010 and on Human Rights.

Southwark's planning officers, and will be submitted again in support of this representation at the plan examination if necessary.

Organisation: Friends of Burgess Park
NSPPSV62

- The research and conclusions drawn from two studies commissioned by the GLA in 2016 and 2017 on the relationship between tall buildings, affordable housing and viability. Report obtained by Southwark Law Centre in March 19 following a FOI request. Concerns noted include:
 - o Tall buildings are not generally delivering Fast Track levels of affordable housing, with the issue particularly evident in schemes in lower value outer London areas where sales values are significantly lower and
 - o A range of case studies shows that increased height does not generally deliver additional affordable housing and in a number of cases has the opposite effect – this is particularly relevant for Aylesbury where there is the intention to increase number of dwellings.
- o The reasons for this include, that although taller buildings generate higher values per square foot this doesn't always cover the additional construction costs so the delivery of the upper floors can impact on the viability of the entire scheme.
- It does not comply with the London Plan which requires a plan led approach to tall buildings. This is relevant to Aylesbury AAP and Aylesbury Vision and the Burgess Business Park (NSP site) where alternative approaches to design could deliver on density through an alternative design to tall towers.
- The amended policy P14 is unsound as it doesn't describe accurately what a tall building is. The policy states: "Tall buildings are significantly higher than surrounding buildings or their emerging context". Emerging context can imply that as prospective developments are put forward before reaching planning approval they become defacto the context. This is unsound.
- As development becomes denser and taller some of the issues that could affect any scheme – such as amenity spaces, quality of building design, scheme layout, scheme

P14 is considered compliant with the Mayor's adopted London Plan (2016) and the emerging draft New London Plan, as the workings of our plan-led approach is set out in the emerging Tall buildings background and research paper with an urban design evaluation section mapping out constraints within the Borough. The background and research paper also discusses how 'appropriate, sensitive and in appropriate locations' have been identified. Further to this specific site allocations have been identified to anticipate tall building development within the guidance section to ensure that there is a clear plan-led approach to constructing tall buildings. 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.

management – come under more pressure. (Lessons from higher density development, GLA 2016)

- The policy P14 should be justified in relation to New Southwark Plan Policy P18: Conservation of the historic environment and natural heritage: Conserve and enhance the significance of the following heritage assets and their settings: including registered parks and gardens and Policy P54: Protection of amenity: Development should be permitted when it does not cause an unacceptable loss of amenity to present or future users.
- Tall buildings of say 15 storeys, 20 storeys, or more, adjacent to a heritage space, designated public park or Metropolitan Open Land will necessarily result in a significant loss of public visual amenity because of overlooking of the public amenity, visual impact and loss of amenity and in some cases loss of sunlight and increased wind. Evidence base on shadow onto Burgess Park over six months of the year can be provided. shadow studies indicate that tall buildings will have significant impact on Burgess Park having a negative impact and reducing the quality of the green space for the health and well-being of residents. This is particularly important to consider cumulative impact of multiple developments and multiple buildings.
- Such buildings will necessarily therefore be in conflict with New Southwark Plan policies P18 and P54.
- By contrast, a 10 storey building or a building with fewer than 10 storeys, say, adjacent to a designated public park or Metropolitan Open Land will not necessarily result in a significant loss of public visual amenity because of overlooking, because, from examples of precedent and albeit with considerable effort, planning, and especially time, it is possible to screen buildings up to 10 storeys tall from intrusive overlooking of public parks.
- The Southwark Council's notes in response to the previous consultation a revised tall buildings research paper which apparently has not been made public or possibly even completed. Yet the Tall Buildings policy is prepared without the benefit of this research. The policy should:

- explain how Southwark takes a plan-led approach to tall buildings, and how ‘appropriate, sensitive and inappropriate locations’ will be assessed.
- define what is meant by ‘tall building’ and identify the general building heights that would be appropriate
- define what is meant by ‘context’
- define what is meant by ‘emerging context’
- clearly state that tall buildings would be sensitive in areas where they might have a negative impact on the setting and views of public and protected open spaces
- define ‘exemplary architectural design’ and explain how and by whom ‘exemplary’ will be assessed.

Individual

NSPPSV177 Susan Hill

In addition, I would like to speak at the Examination in Public

I do not consider the plan to be legal and sound for the following reasons:

- I do not consider the Plan to be legal and sound because it is not effective and does not take into account the continued impact on the environment from these tall buildings that are in breach with the Southwark statement to be carbon neutral by 2020. ALL of these buildings will be built after the 2020 deadline – stated by the council to be carbon neutral. In addition, the consultation has been woefully ineffectual in including participation of the local community and stakeholders in the area.
- Holistic design: The amended policy shows where tall buildings are expected to be. It is my view that this map is vague and unclear. There is no graphic illustration of where tall buildings are anticipated. As the developments come before the planning committee, they are taken one at a time, and the impact on the whole of the community should be inherent in any development.
- Degradation of Communities: The amended policy defines tall buildings as ‘significantly higher than surrounding buildings or their emerging context’. This statement is meaningless and fails to identify precisely where tall buildings are

P14 is considered compliant with the Mayor’s adopted London Plan (2016) and the emerging draft New London Plan, as the workings of our plan-led approach is set out in the emerging Tall buildings background and research paper with an urban design evaluation section mapping out constraints within the Borough. The background and research paper also discusses how ‘appropriate, sensitive and in appropriate locations’ have been identified. Further to this specific site allocations have been identified to anticipate tall building development within the guidance section to ensure that there is a clear plan-led approach to constructing tall buildings. 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.

This policy does adhere with the National Planning Policy Framework, the London Plan and the Mayor’s Good Practice Guide to Estate Regeneration (2018) because the Council does ensure that adequate assessment is made before approval of a demolition, that refurbishment of the existing homes would not be viable in order to achieve the same targeted benefits that the demolition would, whilst following P9: Optimising delivery of new homes and the Residential Design Standards.

considered to be suitable or the cumulative impact of clustering. The London plan states that buildings must be in line with the current culture of existing communities. There is a new Social Regeneration Charter for the Old Kent Road which sets out the ways in which Southwark Council intends working with local communities. The consultations have been piecemeal, ineffectual in engaging with the community, ways of participation for those who are tech savvy have lacked clarity or transparency.

- Viability: The GLA report dated 2018 on Tall Buildings, affordable housing and viability evidences that overall tall buildings are not generating fast track, affordable housing and that there is the potential to design out affordable housing as the additional costs of construction and maintenance reduce the surplus available for delivering affordable housing. There are (one slated for the current B&Q space on OKR) are clearly stating that they are not viable, yet permission was granted. Public transport has not been accounted for.

- Housing: The density of tall buildings are woefully inadequate in delivering the type of housing needed to address the council stated housing shortages in Southwark. Current developments focus on 1 and 2 bedded properties, these are clearly inadequate for the backlog of families needing accommodation.

- Environmental: Tall buildings cannot be considered to be carbon neutral. Southwark has pledged to become a carbon neutral Borough by 2030 in line with the Mayor of London's aspirations. Tall buildings are in conflict with this and contradict NSP policies Healthy, Active Lives and Best Start in Life. Therefore, I do not consider the Plan to be legal and sound because it is not effective and does not take into account the continued impact on the environment from these tall buildings that are in breach with the Southwark statement to be carbon neutral by 2020. ALL of these buildings will be built after the 2020 deadline – stated by the council to be carbon neutral.

In addition, the consultation has been woefully ineffectual in including participation of the local community and stakeholders in the area. - Southwark has moved up its' target to be carbon neutral by 2030. This does not square with the planning permissions for tall building developments that are being approved with such haste, down the Old Kent

P69: Energy sets out the minimum standards for all major developments, reducing the carbon dioxide emissions in line with the minimum requirements of the London Plan which includes 100% on 2013 Building Regulations Part L standards for residential development; and a minimum of 40% on 2013 Building Regulations Part L up to 2019, and zero carbon (100%) from 1 January 2019 onward, for non-residential development. This follows governmental guidance which is to procure ambitious targets to minimise Greenhouse gas emissions (Policy SI2 of the New London Plan). For development that do not meet these minimum requirements, the council has a carbon offset scheme in place where mitigation of the shortfall against carbon emissions reduction requirements are secured off-site through financial contributions. The provision of tall buildings and their subsequent phasing plans, regardless of when construction commences, will be subject to these policies. This ensures that new development in the borough meets the highest energy standards to help us meet targets moving towards Carbon neutrality by 2030.

Carbon offset funds are released by the Council incrementally and through approval by planning committee, to ensure that the impacts of the spending of offset money most effectively contributes to the wellbeing of our communities and in line with the Council's targets for sustainable development. The designation of carbon offset funds through planning committee, which are open to public engagement and available to view online.

Community consultation can be found in our Consultation Summary published on our website. Wider assessment of social and environmental impacts of regeneration so far is undertaken and monitored in our Integrated Impact Assessment, which is a

Road, that the residents do not have a chance to be adequately informed or voice their opinions (despite the work from the local councillors).

There have been two high-profile developments: Ruby Triangle and the development at the current site of B&Q on Old Kent Road, that have, without embarrassment, paid the carbon offset fee (of around £1 Million) instead of working to make the developments carbon neutral. Indeed, the development at B&Q is not financially viable, yet still received planning permission. These payments go against the very fundamentals of carbon neutrality.

Southwark needs to be honest with itself and its residents and to decide if it is going to be carbon neutral and demand carbon neutral developments or to continue to see tall building developments as a revenue stream, as carbon offset fees are happily being paid by developers so that the development can get through committee.

The carbon offset fees are a one off – easily included in a contingency line-item in the developer's budget. Yet, the community in Southwark will continue to pay a price via climate change for years to come.

- Levitt Bernstein, a UK leading expert in housing design and construction submitted recent evidence on the London Plan to the GLA in relation to tall buildings and stated the following:

“We are very concerned by the recent proliferation of tall buildings, particularly the increase in residential towers. Such an increase in high rise residential buildings also takes us into uncharted territory in terms of their long-term environmental and social impacts. There are relatively few precedents when it comes to major refurbishment. Historically, new build high-rise blocks have tended to be in council ownership and flats have been rented albeit with some leaseholders as a result of Right to Buy. This has made it possible to decant residents where major work is needed; Park Hill in Sheffield is a good example. This is much more difficult when flats are sold. It will be almost impossible to empty a private tower block when major work is needed 20-40 years on. The risk is that they fall into gradual decline with only urgent repairs carried out on an ad hoc, piecemeal basis. As the building degrades, people will leave. Those who

requirement under the Public Sector Equalities Duty (2011) (under section 149 of the Equalities Act 2010). The council carries out Equalities Analysis (EqIA) of its plans, decisions and programmes to consider the potential impact (positive and negative) of proposals on the key ‘protected characteristics’ in the Equality Act 2010 and on Human Rights.

remain may find it hard to sell and/or find themselves in negative equity, and service charges may no longer cover costs. We know that physical decline is linked to social and economic decline; in promoting tall buildings (which is effectively what is happening) the GLA should be mindful of the long-term social and practical implications, particularly as tall buildings are inevitably also visually dominant.

The evidence of experts in this matter should be given due weight.

- This Policy can be made sound. There are alternative means of achieving population density, avoiding urban sprawl and increasing activities and life opportunities for nearby residents. Some of the highest levels of population density in London are in Westminster and Kensington and Chelsea. These Boroughs rarely have residential buildings above 8 storeys. Whilst this does not achieve the density of the very tallest buildings they are carbon neutral, family friendly and avoid the unpleasant environmental effects associated with tall buildings.

This policy can be made sound by the following:

- Southwark is well aware that the area of OKR that is to house these mega structures has the lowest life expectancy of the whole borough (or London). The information as well as the knowledge and expertise of these communities and stakeholders should be harnessed as plans evolve by sense checking and producing information that is readily accessible and understandable in a variety of ways (paper, digital, open meetings, etc) through a variety of ways (churches, community outreach, hosted events, etc) to maximise the number of participants. Given the scope of this disruption to OKR, Southwark should take it upon itself to ensure that old and new ways of communicating with communities is explored. The old way is not working!

- I reiterate what a number of people have stated; existing, local communities should benefit directly from the sums of money generated by development and environmental fees and they should be invited participants in the formulation of the S106 agreement.

- It is inevitable that differences of opinion and issues of power will emerge but

currently regeneration is development led. This balance needs to shift in favour of local communities for this strategic policy to be made sound, and to ensure that the communities experience the minimum of disruption in order to continue to thrive. This includes taking into account the impact of mega towers will have on communities, mental health and access to amenities.

- Looking beyond mega towers to more salubrious developments that foster well balanced and carbon neutral communities, with assets that address the very real need for Southwark 'families' a space to grow and thrive.

- Should not the developers continue to pay the environmental (carbon tax) fee for the lifetime of the development? Or, better yet, if Southwark sees these fees as a revenue generating activity, then a percentage of the build costs should be incurred, say 10% of the build cost. Thereby, the developers would take seriously the need to develop a scheme that is carbon neutral, in line with the Southwark promise to be carbon neutral by 2030. These developments will last longer than 2030, yet still not be carbon neutral – thereby, they neither support the documented dictate that the council become carbon neutral by 2030, nor help solve the 'climate emergency' as called by the government.

What will the council do to ensure that all developments up and down the OKR are carbon neutral? How will the community benefit from the carbon offset fees during the life-time of the development? These are long term questions that have yet to be addressed.

In addition the failure to be truthfully carbon neutral is and will continue to be exacerbated by the failure to plan for infrastructure. The provision for public transport lags behind the timeline for forging ahead and building 'tall buildings'. The extended Bakerloo Line is a pipe dream, not funded and unlikely to be available to residents until the middle of the century. The people for whom these buildings can be considered affordable will have vehicles, need parking and possibly not use the woefully inadequate public transport.

<p>Southwark needs human scale development and the continuation of its diverse communities guaranteed. This Policy will not encourage or allow that.</p>	
<p>Organisation: Tide Construction Ltd NSPPSV413</p> <p>We welcome that draft policy P14 seeks to direct tall buildings to Major Town Centres, Opportunity Area Cores, Action Area Cores and the Central Activities Zone.</p> <p>The amended policy also states that proposals of 30m or more must provide, functional public space, widened footways and routes to accommodate increased</p> <p>Planning Policy London Borough of Southwark PO Box 64529 London SE1P 5LX By email. planningpolicy@southwark.gov.uk 21 May 2019 let.057.AP.S.00030008 2</p> <p>footfall and new publicly accessible space at or near the top of the building and communal facilities for users and residents when above a height of 60m. Development viability may render it difficult to deliver such facilities in practice however and the importance of scheme viability should be recognised within the wording of this draft policy.</p>	<p>Representation noted. Policy P14 has been updated to re-word the previous policy requirements of point 3 to not be only applicable to developments above 30m and 60m, but a standard for all tall building developments.</p>
<p>Organisation: Historic England NSPPSV83</p> <p>Historic England would wish to reiterate our previous comments in relation to the draft tall buildings policy during previous consultation exercises - we do not consider that as set out policy P14 adequately reflects national planning policy on the historic environment. We therefore recommend that clause 2.6 be moved to the end of the previous section and be amended to:</p>	<p>Representation noted.</p> <p>Representation has been noted. Heritage-led regeneration is a concept in support of Policy 7.9 of the adopted London Plan, which states:</p> <p><i>“A. Regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration. This includes buildings, landscape</i></p>

Conserve and where appropriate enhance the significance of designated heritage assets and their settings

This amendment would ensure the policy concerned is compliant with the NPPF.

Para 8 of the National Planning Policy Framework (NPPF) indicates that achieving sustainable development through planning has an economic, a social and an environmental objective. The environmental objective includes the protection and enhancement of the historic environment, to be delivered through the preparation and implementation of a local plan.

NPPF para 20 further indicates that strategic policies in local plans should set out an overall strategy for the conservation and enhancement of the historic environment.

We consider that policy P14 is not justified or consistent with national policy. It indicates at 2.5 that tall buildings proposals should 'avoid unacceptable harm to the significance of designated heritage assets or their settings' – this would suggest that there is an undefined level of harm to such assets that would be acceptable. The NPPF is clear that any harm or loss of significance to a designated heritage asset a result of development proposals requires convincing justification and the achievement of public benefits (para 194).

The existing text is also contrary to Policy D8 - C1d, which also requires tall buildings proposals to 'avoid harm to the significance of London's heritage assets and their settings'. This text is also in the draft 2017 London Plan currently undergoing Examination in Public.

We note that clauses 2.1-2.5 relate to the potential strategic location of tall buildings, while 2.6-2.8 deal with issues to be addressed through their design. However, once the principle of the location of a tall building has been established it may not be possible to address or mitigate against all the potential impacts on the historic environment, even through the highest quality design.

features, views, Blue Ribbon Network and public realm.”

B. The significance of heritage assets should be assessed when development is proposed and schemes designed so that the heritage significance is recognised both in their own right and as catalysts for regeneration. Wherever possible heritage assets (including buildings at risk) should be repaired, restored and put to a suitable and viable use that is consistent with their conservation and the establishment and maintenance of sustainable communities and economic vitality

C. Boroughs should support the principles of heritage-led regeneration in LDF policies”.

SP2 therefore supports the adopted London Plan through the incorporation of heritage-led regeneration, and is sound. It should be noted that all policies in the NSP are intended to be regarded as a whole, meaning there may be some cross-over between different Strategic Policies.

<p>While we welcome the locational principles in section 2 of policy P14 including those relating to strategic views and relationship with local character and context, we consider there should be an appropriate reference to potential effects on the historic environment.</p> <p>As set out, we consider that the draft policy would be likely to lead to inappropriate development proposals coming forward for tall building proposals that would have a harmful impact on the historic environment and the significance of individual heritage assets. This would mean the Plan would fail to help achieve sustainable development as defined by the NPPF in the Borough.</p>	
<p>Individual NSPPSV415</p> <p>We need to stop development of buildings that are over 7 stories tall to stop Southwark from becoming a wind tunnel with no light and no street level community. We need to stop development of buildings that are over 7 stories tall to stop Southwark from becoming a wind tunnel with no light and no street level community.</p>	<p>Representation noted. Mitigation against environmental impacts such as wind shear is covered in policy P14, now clarified as point 3.3.</p>
<p>Organisation: Rolfe Judd Planning on behalf of Berkeley Homes Ltd NSPPSV21</p> <p>These representations have been prepared on behalf of Berkeley Homes (South East London) Ltd (Berkeley) regarding the draft New Southwark Plan (NSP) Proposed Submission Version: Amended Policies January 2019 consultation. These representations follow on from previous representations made by Rolfe Judd Planning on behalf of Berkeley in September 2016 in respect of the New Southwark Plan – Preferred Option June 2016, in September 2017 in respect of the New Southwark Plan Preferred Option - New and Amended Policies June 2017 and in February 2018 relating to the New Southwark Plan Proposed Submission Version.</p> <p>We understand that following the consultation on the Amended Policies January 2019 that the Council will undertake a full consultation on the proposed Submission Version of the NSP prior to submission to the Secretary of State for Examination.</p>	<p>Representation noted. Tall building development will be assessed against all policies in the NSP, including policy P54: Protection of amenity which provides guidance on how to mitigate impacts related to daylight and sunlight. It should be acknowledged that the NSP and its policies must be read as a whole. Site allocations that have been designated to anticipate tall buildings have been strategically assessed through our Sites Methodology Paper. This methodology paper underpins the site vision section to 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.</p>

Overall we consider the amendments to the policies in the NSP to be broadly sound and support the objectives of the Council to deliver new homes and jobs in the Borough. However it is important to review the policies within the context of the wider NSP. We are therefore keen to further contribute to the next full consultation on the Submission Version of the plan and will provide additional comments at the relevant stage.

About Berkeley Group and its investment in Southwark

Berkeley is also a significant investor in Southwark. It has delivered a range of innovative and exemplary urban regeneration projects across the Borough including developments at Tabard Square and One Tower Bridge. They are currently also delivering development at One Blackfriars. These developments deliver new infrastructure, high quality public realm and many new jobs in addition to a large number of affordable homes contributing to the success of the Borough.

Berkeley Group continues to invest in the Borough as demonstrated by its recent application to Southwark for a mixed-use development at Malt Street along the Old Kent Road. A planning application was submitted to the Council in July 2017 (Council Ref: 17/AP/2773). The scheme London Borough of Southwark May 2019

provides a mixed-used development of high quality design that incorporates up to 1,300 homes (including 40% affordable homes) and up to 7,000sq.m of non-residential floorspace within an attractive and inclusive environment, optimising the use of this allocated site (Site Allocation OKR 10) in the Old Kent Road Area Action Plan (DOKR AAP (December 2017) and Site Allocation NSP65 in the NSP.

The application is in direct response to the Council's vision for the area and the current DOKR AAP as well as the revised DOKR currently under consideration by officers. Both documents seek 20,000 new homes in the Opportunity Area by 2036. The application will make a substantial and positive contribution towards the overall ambitious housing delivery targets of the Council's Local Plan of achieving 27,362 homes by 2025. The application scheme will also deliver a range of new job opportunities to substantially increase the provision of employment on the site helping the Council meet its target of 10,000 new jobs in the area.

Berkeley's investment in the Borough will continue so long as the delivery of viable

development can be achieved. This relies upon development plan policies and guidance that encourages regeneration.

Representations on behalf of Berkeley Homes (SEL) Ltd

We provide these remarks as interim representations ahead of further comments on the Submission Version of the plan in summer 2019.

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

Concluding Comments

Berkeley continues to strongly support the Council in its identification of the benefits of a combined London Borough of Southwark May 2019

Borough wide approach to deliver higher density developments within designated growth areas, town centres, opportunity areas and areas of high public transport accessibility. The focus on brownfield land and highly sustainable and accessible locations is important to delivery of 'Good Growth' as supported by the draft London Plan.

Whilst Berkeley supports the Council in the preparation of the plan and its aspirations for the Borough we are keen to continue to review the policies within the context of the next consultation on the NSP. We will therefore participate in the next full consultation on the plan and will provide additional comments at the relevant stage.

We agree with the Council's approach to delete Part 2.11 which requires developers to provide new publically accessible spaces at or near to the top of buildings above a height of 60m.

The addition of publicly accessible areas at the top of a taller building adds significantly to construction cost and long term operational management costs of a building. This is through the need for additional lifts, additional capacity for means of escape from upper floors and additional security & facilities management.

Furthermore publicly accessible spaces in developments should be in targeted locations and not fixed to specific buildings by way of addressing policy. The provision of public

<p>access to specific buildings should instead be sought in exceptional circumstances through S106 obligations. It is therefore not reasonable or nor necessary to expect public access to the uppermost floor of all future tall buildings.</p>	
<p>Organisation: Southwark Studios NSPPSV210</p> <p>No further comment applied</p>	<p>Noted.</p>
<p>Organisation: WSP Indigo Planning on behalf of Zurich Assurance Ltd NSPPSV420</p> <p>We write on behalf of our client, Zurich Assurance Ltd c/o Threadneedle Portfolio Services Ltd ('Threadneedle') in response to the New Southwark Plan (NSP) Proposed Submission Version consultation.</p> <p>Our client owns Beckett House, which is located at 60 St Thomas Street on the southern side of the street. The site currently comprises a seven-storey office building, occupied by the UK Immigration Service. The site is located within the Bankside, Borough and London Bridge district town centre, the Central Activities Zone (CAZ), and is also within the identified Opportunity Area.</p> <p>On behalf of Threadneedle, we have made representations to earlier versions of the New Southwark Plan including the Area Visions, Site Allocations document and the previous iteration of the Proposed Submission Version consultation in February 2018.</p> <p>Background On behalf of our client, we have been promoting their site for comprehensive redevelopment within the emerging plan over the past 11 years. Recently, we have been in active discussion with the council, the GLA, adjoining landowners, and local residents about the development proposals for the site and its place within the wider St Thomas Street East Framework.</p> <p>Since the last stage of consultation on the New Southwark Plan, the context around the site has changed and on 14 May 2019 planning permission was granted at committee</p>	<p>Representation noted. Policy P14 has been updated to re-word the previous policy requirements of point 3 to not be only applicable to developments above 30m and 60m, but a standard for all tall building developments.</p>

for the student accommodation scheme at Capital House, directly to the west of our client's site.

Other planning applications have also been submitted at the Vinegar Yard and Snowfields sites which also form part of the wider St Thomas Street East Framework area.

It is our client's ambition to submit a planning application for the redevelopment of their site, for office uses including ground floor retail and associated public realm improvements, in Summer 2019.

Purpose of representations

Fundamentally, we are keen to ensure that the emerging policies and draft allocations within the NSP allow for the most efficient and viable redevelopment of the site and do not prejudice ongoing pre-application discussions or detailed design and assessment work that we are currently undertaking.

Our previous representations were based on the previous iteration of the Preferred Submission version of the NSP. The current consultation document makes changes to some, but not all of the emerging policies and allocations. These representations focus on these amendments, but there are also changes that have not been made to the current draft of the NSP despite comments and we wish to re-emphasise these comments again.

We welcome that draft policy P14 seeks to direct tall buildings to Major Town Centres, Opportunity Area Cores, Action Area Cores and the Central Activities Zone.

The amended policy also states that proposals of 30m or more must provide, 3 functional public space, widened footways and routes to accommodate increased footfall and new publicly accessible space at or near the top of the building and communal facilities for users and residents when above a height of 60m.

Development viability may render it difficult to deliver such facilities in practice however and the importance of scheme viability should be recognised within the wording of this draft policy.

Individual

Representation noted.

NSPPSV136

Please give details of why you consider the New Southwark Plan to be unsound for this policy amendment.

The policy to require accessible public space at the top of all tall buildings has been removed and this seems appropriate and sound.

The policy is unsound for the following reasons:

- It is not positively prepared because it fails to define a 'Landmark' building. A recent example of this is the Cantium development on the B&Q site on the OKR, approved at Planning Committee in March 19. The 48 storey tower will be the 5th tallest building in London and presumably fulfils the definition of a 'landmark' building. It will have a viewing platform on the 46th floor but this will only be available to invited members of the public on 12 days per annum.
- The policy is not positively prepared and not effective because the definition of a tall building and the locations where these will be allowed is not clear:
 - o There is no clear definition of a 'tall building': the first section of the amended policy talks about tall buildings generally, then there is a section talking about tall buildings over 30m which suggests that some tall buildings will be under 30m.
 - o The map provided on p24 is unclear as it only shows locations in the north of the borough. The amended policy states that action area cores are 'typical' locations for tall buildings: there are action area cores in all parts of the borough.
 - o It is also important to note that action area cores such as Rye Lane Peckham are designated conservation areas, in which tall buildings are not considered appropriate (Rye Lane Peckham Conservation Area Appraisal, undated, section 5.2.4). The policy says that 'unacceptable harm' to heritage assets should be avoided. This suggests that some harm would be acceptable, which goes against other sections of the NSP, notably P17: Conservation areas; and P18: Conservation of the historic environment and natural assets. Unless the NSP provides further guidance on this, there is a risk that tall buildings could undermine conservation designations in these areas, making the Plan unsound.
- The amendment is not consistent with London planning policy as it fails to provide for the testing of alternative building forms at the design stage as set out in draft London

P14 is considered compliant with the Mayor's adopted London Plan (2016) and the emerging draft New London Plan, as the workings of our plan-led approach is set out in the emerging Tall buildings background and research paper with an urban context evaluation section mapping out constraints within the Borough. Further to this specific site allocations have been identified to anticipate tall building development within the guidance section to ensure that there is a clear plan-led approach to constructing tall buildings. The background and research paper also discusses how 'appropriate, sensitive and in appropriate locations' have been identified. 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.

Representation has been noted. Heritage-led regeneration is a concept in support of Policy 7.9 of the adopted London Plan, which states:

"A. Regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration. This includes buildings, landscape features, views, Blue Ribbon Network and public realm."

B. The significance of heritage assets should be assessed when development is proposed and schemes designed so that the heritage significance is recognised both in their own right and as catalysts for regeneration. Wherever possible heritage assets (including buildings at risk) should be repaired, restored and put to a suitable and viable use that is consistent with their conservation and the establishment and maintenance of sustainable

Plan policy D4 Housing quality and standards which details the qualitative design aspects to be addressed in housing developments, saying that: “The built form, massing and height of the development should be appropriate for the surrounding context, and it should be shown that alternative arrangements to accommodate the same number of units or bedspaces with a different relationship to the surrounding context have been explored early in the design process particularly where a proposal is above the applicable density indicated in part C of Policy D6 Optimising density”.

Please set out what change(s) you consider necessary to make the New Southwark Plan legally compliant or sound.

- The policy should define a ‘Landmark’ building and state where they be located and how many of them there will be.
- The policy should clarify the relationship between tall buildings and conservation areas, to ensure that tall buildings are not sited in places where they could have a negative impact on the conservation area. Specifically, in the sentence referring to the avoidance of ‘unacceptable harm’ to heritage assets - the word ‘unacceptable’ should be removed.
- The policy should be amended to make it consistent with London planning policy in terms of providing for the testing of alternative building forms at the design stage.

communities and economic vitality

C. Boroughs should support the principles of heritage-led regeneration in LDF policies”.

SP2 therefore supports the adopted London Plan through the incorporation of heritage-led regeneration, and is sound. It should be noted that all policies in the NSP are intended to be regarded as a whole, meaning there may be some cross-over between different Strategic Policies.