



NEW SOUTHWARK PLAN
PROPOSED SUBMISSION VERSION
CONSULTATION RESPONSES
SUMMARIES
JANUARY 2020

IP1 Infrastructure

- The policy is supported in its reference to working with neighbouring boroughs.
- The policy is supported in its requirement for new development to be aligned with water supply and waste water infrastructure capacity.
- The policy should emphasise the need for developers to consult Thames Water as early as possible to discuss any potential water and wastewater network reinforcement requirements, and where appropriate, apply phasing conditions to ensure necessary infrastructure upgrades are delivered ahead of phased occupancy.
- The policy should address the congestion at Denmark Hill Station.
- The policy should maintain existing parking for local residents.
- The policy is not considered legally compliant - no reason was given in relation to the policy achieving the tests of soundness.
- The policy is not considered sound - no reason was given in relation to the policy achieving the tests of soundness.
- The policy is not considered justified - no reason was given in relation to the policy achieving the tests of soundness.
- The policy is not considered to be consistent with national policy and the London Plan.

IP2 Community Infrastructure Levy (CIL) and Section 106 planning obligations

- The policy should require developers to fund the additional school places that are needed to meet the need generated by new development.
- The policy should replace the word 'offset' with 'mitigate' to improve clarity and to be in line with the relevant wording in the NPPG.
- There is concern about the imposition of CIL on nominated schemes not providing beds/rooms below £168/week.
- There is concern that schemes which are to be delivered in Opportunity Areas in advance of other schemes disproportionately contribute to the delivery of future infrastructure across the Opportunity Area. Each development site should contribute a proportional amount to the Council to deliver future infrastructure.
- The Metropolitan Police Service believes that there is a strong case for inclusion of funding for policing infrastructure within the CIL charging schedule.
- The policy is considered unsound, since an unacceptable development can not be offset as it is unacceptable. It is suggested that an amendment be made to offset "any potential adverse impact of a proposed development".
- The wording in the accompanying CIL SPD, to which the NSP refers to, is not clear in setting out the process for allocating CIL. In particular, the 25% spent near a development.

IP3 Enforcement against unlawful development

- The policy is not considered legally compliant - no reason was given in relation to the policy achieving the tests of soundness.
- The policy is not considered sound - no reason was given in relation to the policy achieving the tests of soundness.
- The policy is not considered justified - no reason was given in relation to the policy achieving the tests of soundness.
- The policy is not considered consistent with national policy and the London Plan - no reason was given in relation to the policy achieving the tests of soundness.
- The policy is not considered effective - no reason was given in relation to the policy achieving the tests of soundness.
- The policy is not positively prepared - no reason was given in relation to the policy achieving the tests of soundness.

IP4 Compulsory Purchase Order (CPO)

- Objection states that SP2 will be used to justify CPOs under S 226 1A Town and Country Planning Act, to the detriment of existing residents' well-being.
- The use of CPOs on homeowners should be based on clear and well-evidenced strategies, to ensure the protection of human rights of residents facing displacement and disruption.
- Objection states that demolition of existing council estates beyond site identified in the NSP is likely.
- The policy should be amended to provide better mitigation of the negative impacts of regeneration, and have regard to the DCLG's Estate Renewal National Strategy, the Mayor of London's draft Good Practice guide to Estate Regeneration and the DCLG's 2015 guidance on the use of CPO.

IP5 Monitoring Development

- The policy is not considered effective, as the Council has a record of not monitoring the actual outturn of development and regeneration across the borough.
- The policy is not considered effective as monitoring relies on subjective judgments by Southwark staff rather than objective criteria.
- Representation highlights that the Authority Monitoring Report should be made more accessible to the public.

IP6 Statement of Community Involvement

- The policy is not legally compliant as the Statement of Community Involvement (SCI) is out of date.
- The policy is not legally compliant with the 2011 Localism Act.
- The SCI is not integrated into the plan.
- The consultation approach in the development of the plan has not engaged the local voluntary and community sectors effectively.
- The New Southwark Plan does not comply with the SCI.
- The policy is not considered to be in conformity with national policies.
- The policy should establish a genuinely collaborative process between the Council and the voluntary sector and local community organisations to develop a way of implementing the Localism Act and the Voluntary and Community Sector strategy.
- The voluntary and community sectors in the borough have been poorly engaged in the development of the plan.
- No developments either identified in Site Allocations or more generally, should be agreed until there is a real opportunity for "early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses".
- Gipsies and Travellers have not been consulted with in accordance with the Council's Statement of Community Involvement.
- Community engagement on planning issues can be abused by TRAs.
- The policy is not considered sound - no reason was given in relation to the policy achieving the tests of soundness.
- The policy is not considered to be positively prepared - no reason was given in relation to the policy achieving the tests of soundness.
- The policy is not considered justified - no reason was given in relation to the policy achieving the tests of soundness.
- The policy is not considered effective - no reason was given in relation to the policy achieving the tests of soundness.

IP7 Local Development Scheme

- The policy is not considered to be legally compliant - no reason was given in relation to the policy achieving the tests of soundness.

- The policy not considered sound - no reason was given in relation to the policy achieving the tests of soundness.

Miscellaneous Comments – General Comments (PSV)

- The Mayor of London made general comments on industrial sites and office floorspace requirements, and protection.
- Officers do not fully understand the impacts, and pressures faced by local people and businesses of bad development decisions. Specifically regarding the issue of density and how it changes a neighbourhood.
- NSP as currently drafted has few merits, it is too unspecific to address and manage opportunities in the borough and the right balance of uses.
- The examination is an opportunity to demand a revamp of the policies that more effectively address the sustainable challenges facing the borough, especially Bankside.
- The NSP is considered to support the objectives of the Council to deliver new homes and jobs in the borough.
- Supportive of the focus on the deliver of ‘Good Growth’ as supported by the draft London Plan.
- Support for the Council in its identification of the benefits of a combined Borough wide approach to deliver higher density developments within designated growth areas, town centres, opportunity areas and areas of high public transport accessibility.
- A more robust framework is needed when permitting loss of employment space in CAZ, town centres, opportunity areas and site allocations.
- Closer attention should be paid to recognising business districts and archaeological interest.
- The plan should recognise the diversity in the local economy.
- Critical of NSP75 – Aylesham Centre and Peckham Bus Garage – need here is for affordable homes, good jobs and a celebration of Peckham, by opening up street design and being more mindful of tall buildings. These are comments also made to the plan more generally.
- The Environment Agency has set out the NSP is founded on a robust and credible evidence base, and the findings of the sustainability appraisal have been reflected in the document and policies. The plan is also consistent with national planning policy and complies with the legal requirements and appears sound.
- Support reinforced for the OKR area vision and site allocation NSP66.
- Historic England notes and welcomes the range of development management policies relating to various elements of the historic environment within the Plan. However, we consider that this represents a reactive approach to the management of the historic environment and that more could be done on the part of the Council to establish a positive strategy.
- The NSP has failed to achieve an overall understanding of the economic life of the borough and its current accommodation extent and geography.
- Southwark Council has failed to carry out a comprehensive assessment of the type of land uses and need in the borough. Namely regarding, retail, industrial and office floorspace.
- Old Jamaica Road Business Estate allocation has not been mentioned in the PSV version of the NSP.
- Objections raised regarding failure to objectively assess and define the business and other development needs of Southwark.
- Objections raised regarding failure to meet the business development needs of Southwark.
- Objections raised regarding failure to ensure that the assessment of and strategies for housing, employment and other uses are integrated, and that full account has been taken of relevant market and economic signals.
- Objections raised regarding failure to be aspirational but realistic, and to pay careful

attention to viability and costs in plan-making and decision-taking, and define a plan that is deliverable.

- Support for the plan regarding saving existing communities, homes and lives.
- Objections to the vague wording of the plan, as it might not be robust enough to be compliant with the London Plan.
- Concerns raised about interconnectivity in Southwark regarding businesses, housing, green spaces and local landscapes.
- The plan is a departure from national and London policy.
- The strategy is not coherent with neighbouring boroughs.
- Concerns raised over 'council not meeting promises'.

Legality concerns:

- The NSP is not sound because it fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan, the transport strategy is outdated, and it has not done enough to tackle air pollution.

Consultation

- NSP information and documentation was not prepared, presented or made available in a way that was accessible to all Southwark residents and businesses affected by them.
- The Statement of Community Involvement is not fit for purpose.
- The NSP consultations and development is difficult to track and not carried out properly.
- The Statement of Community Involvement is outdated.
- Proper submission receipts have not been received in some cases, this undermines the consultation process.
- Objections raised regarding consultation period lengths being too short and inaccessibility of documents.
- Objections raised regarding failure to comply with Statement of Representations procedure.
- Objections raised regarding failure to carry out early and meaningful engagement and collaboration with businesses during NSP preparation.

Legality concerns:

- NSP is not legally compliant because the consultation information, documentation and material produced, whether online or hard copy, was not inclusive, accessible or comprehensible to the vast majority of Southwark residents.
- The NSP is not sound because it has not sought to reach a wide audience and does not effectively engage with local communities.
- The plan is unlawful because Southwark Council has not followed its Statement of Community Involvement.
- NSP is not legally compliant because the consultation information, documentation and material produced, whether online or hard copy, was not inclusive, accessible or comprehensible to the vast majority of Southwark residents.
- The NSP is not sound because it has not sought to reach a wide audience and does not effectively engage with local communities.
- The plan is unsound because it fails to comply with the legal requirements on consultation.

Protocol

- Concerns raised over associated monitoring within the plan.
- The evidence base is not robust enough.
- Objections raised regarding the failure to effectively co-operate with neighbouring

authorities to plan for issues with cross-boundary impacts, working together to meet development requirements which cannot be wholly met within Southwark.

- The NSP is missing a robust evidence base.
- Objections raised concerning failures to keep important planning policy documents up to date.
- Objections raised regarding failure to effectively cooperate with neighbouring authorities to plan for issues with cross-boundary impacts.
- The Plan should not be approved because in preparing it Southwark Council has failed to comply with legal duties under the Equality Act 2010 (“the 2010 Act”).
- Objections raised regarding failure to consider the impact of the policies in the New Southwark Plan on one group protected by the Equality Act 2010, namely Gypsies and Travellers.
- Objections raised regarding failure to carry out a review of land available for economic development, undertaken at the same time as, or combined with, the Strategic Housing Land Availability Assessment.
- Objections raised regarding failure to ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.
- The evidence base is missing schedules, map assessment of accommodation quantum’s, with estimations of the effect of policies, plan designations and allocations, compared with estimates of future need, especially regarding industrial land.

SP1 Quality Affordable Homes

- Contradiction with Policy P1 as SP1 sets out 50% affordable housing and P1 sets out 35% affordable housing.
- Support for the strategic housing target of 50%.
- The policy should set out the London Plan housing target.
- The 5 and 15 year housing land supply report is out of date and incorrectly calculated.
- Support for the policy objective for good quality affordable homes in the borough and welcome the acknowledgement by the Council to encourage innovative solutions to meeting specific housing needs.
- Additional wording should be included in Policy SP1 to recognise that the 50% target is aspirational and will also need to be subject to viability, as per the minimum 35% policy requirement.
- This heading 'Quality affordable homes' should be deleted and not used as a phrase, as it is contradictory and inaccurate as a description for the homes Southwark Council delivers.

Legality of the plan

- This policy is unsound because 35% affordable housing does not meet housing need in Southwark.
- The policy does not set an evidence based housing target; it only relies on the adopted London Plan housing target and therefore is not considered robust.
- This policy is unsound because the aspiration to secure 50% of all new homes as affordable will not keep pace with the demand from newly formed households.

P1 Affordable homes

- More flexibility for tenure split on developments based on local housing need, or in areas that are subject to Area Action Plans/Opportunity Area Planning Frameworks.
- Policy should change the wording from 'social rent homes' to 'social housing homes'.
- Policy should allow fast track route for applications that would provide 35% affordable housing.
- Schemes at a policy compliant level should be unfettered from any review mechanisms.
- Policy should differentiate between public and privately owned land.
- Concerns over the social affordable housing need not being met.
- Objection to vacant building credit not being considered.
- Objection to the small sites requirement to provide affordable housing contributions.
- Changes on small sites and viability should be made to be in conformity with the draft London Plan.
- The supporting text and fact box should be consistent with the social rented requirement to give confidence that the policy is deliverable.
- There should be a higher policy requirement for affordable housing in general and social rented housing in particular.
- The policy supporting text should be updated to accord with the threshold approach outlined within the Mayor's 'Homes for Londoners – Affordable Housing and Viability' SPG (2017).
- The policy should clarify whether financial contributions or units would be sought on small sites.
- Concerns over the number of infill sites identified by the respondent, alongside other future

opportunities will not be delivered if they are overly burdened by financial or other contributions.

- It is unclear what the Council is seeking in terms of affordable housing.
- The policy should be amended to allow for the provision of affordable rented products so that the policy reflects the range of affordable tenures in the current London Plan, Policy 3.11A.
- The definition of habitable rooms provided within the NSP is considered to be overly complex, and it should remain consistent with the adopted planning policy.
- Policy P1 should take into account the costs typically associated with the redevelopment of sites, including an existing retail site such as existing use value, loss of income and cost of re-provision.
- The special circumstances governing the development of food stores should be acknowledged within the NSP and taken into account as part of the process.
- The policy should set out affordable housing requirements in relation to the type of scheme proposed.
- The wording "shall be delivered on-site except in exceptional circumstances" should be reintroduced when applying the requirement for affordable housing.

Legality of the plan

- Concerns over the policy not being legal on the basis that it does not accord with the Written Ministerial Statement of November 2014.
- This policy is unsound because 35% affordable housing does not meet housing need in Southwark.

P2 New family homes

- Additional wording should be included to allow for greater flexibility in such areas where density is expected and encouraged to be greater.
- Policy P2 and Figure 1 should be amended to clarify that the Old Kent Road Opportunity Area "Core Area" will be subject to the 20% minimum of 3-beds.
- Old Kent Road Area Action Plan Core Area should be added to Figure 1.
- This policy is unsound as it defines family housing as including 2 bed homes, lacking conformity with the London Plan which says family housing generally has 3, 4, 5 or more bedrooms.
- Table 2 should be deleted and replaced with a policy requirement which aims for family housing to be delivered in equal measure across the Borough. The target for 3 bed+ homes should be tenure specific so as to meet need.
- Policy P2 is unduly restrictive and does not provide adequate flexibility to private and intermediate housing to be developed in accordance with demand; area-by-area or site specific requirements.
- The policy requirement for providing fixed levels of 2 and 3+ bedroom properties within residential developments would limit the ability for developments to respond to housing need and demand for private sale and private rented accommodation.
- Inflexible approach to the mix of units to be secured from private housing development.
- Objection to the requirement for family homes in apartment blocks to be on lower floors.
- The term major developments is not explained in the plan.
- The policy does not address the evidenced need for 96% of social rented homes to be 3bed+ homes.
- Policy P2 should be amended to be in line with the London Plan.
- The requirement of 3bed+ homes in Elephant & Castle has double from 10% to 20% and this change has not been consulted on previously.

- Concerns over the borough wide limitation on studio units at 5%, there should be an allowance for up to 10% studio units provided only as private units.
- Concerns over the provision of studios to be limited to private housing only.
- The word ‘must’ should be changed to ‘should aim to’ within the policy as not to impact on the delivery of new housing.

Legality of the plan

- The policy is unsound as it defines family housing as including 2 bed homes, lacking conformity with the London Plan which says family housing generally has 3, 4, 5 or more bedrooms.
- Policy P2 is considered to be ‘unsound’ due to the inflexible approach to the mix of units to be secured from housing development is not justified.

P3 Protection of existing homes

- Policy P3 is inconsistent with current London Plan Policy 3.14 and draft London Plan 2017 Policy H10.
- Policy P3 is inconsistent with SP2.
- The policy is not effective as it does not protect homes from demolition, or existing homes and businesses from redevelopment.
- The policy is sound as it recognises the importance of protecting the existing family homes from conversion into smaller homes, unsuitable for families.
- Policy P3 should also refer to the protection of existing Gypsy and Traveller sites.

Legality of the plan

- The policy is unsound as it does not consider the retention of existing affordable and social rented housing stock or bringing vacant properties back into use where possible as social rented housing.
- The policy is not effective because many people's homes are being demolished and it does not protect existing homes.
- The policy is not sound because it is not in conformity with the NPPF, PPTS, current and emerging London Plans in what regards planning for Gypsy and Traveller accommodation needs.

P4 Private rented homes

- Objection to 35% affordable housing requirement.
- Objection to the affordable housing requirement being different to market housing.
- The 30 year minimum term is highly restrictive, and is likely to dissuade developers from investing in developments incorporating this relatively new housing product.
- Policy P4 is not consistent with the emerging London Plan.
- Concerns over the lack of evidence to support the 30 year term instead of a 15 year term.
- Concerns over the set threshold of 100 homes, and not 50 as per the draft London Plan.
- Policy P4 does not make any material allowance for the distinct economics of build to rent development, as required by Central Government, the London Plan and the GLA SPG, subject to viability.
- Policy P4 should apply to all new private rented housing so that improvements in conditions for private renters, such as longer term tenancies, benefit everyone.
- The following wording should be added to the policy: “meeting the same standards of design as build for sale, whilst reflecting the specifics of Build to Rent housing and the demands of those renting”.
- Support for the option to request a tenancy of up to three years with tenant's break clause,

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| <p>however this should be optional.</p> <ul style="list-style-type: none"> • Policy P4 must apply to all new private rented housing so that improvements in conditions for private renters, such as longer term tenancies, benefit everyone. • The policy should accord with the Mayor’s SPG Homes for Londoners: Affordable Housing and Viability, 2017. <p>Legality of the plan</p> <ul style="list-style-type: none"> • It is unsound to apply the 35% affordable housing requirement differently to private rented homes. • To make the policy sound housing offer provided by private rented schemes must be the same as required under Policy P1. • Policy P4 is considered to be ‘unsound’ as it is not in accordance with the emerging London Plan. |
| <p>P5 Housing for older people</p> |
| <ul style="list-style-type: none"> • The policy focuses on the quality of the accommodation as opposed to its overall provision. • Policy P5 fails to recognise the acute and specific need for elderly persons housing in Southwark, and specifically to the south of the Borough. • The evidence base does not include monitoring and evaluation of specialist provision over the last 5 years, compared with the target for Southwark in the current London Plan. • The policy is inconsistent with the declaration by Southwark of an ‘Age Friendly Borough’. • The current London Plan identifies a need for 115 dwellings per year for older people. This target should be referred to in policy. • Schemes for older peoples’ housing should be exempted from contributing to affordable housing on-site. <p>Legality of the plan</p> <ul style="list-style-type: none"> • The policy is unsound as it does not address the issue of down-sizing. • The policy is unsound because it lacks specific requirements by which the policy can be delivered e.g. excellent accessibility and amenity, adequate communal areas. • The NSP fails to plan positively because it does not identify sites where specialist accommodation can be provided. |
| <p>P6 Homes for households with specialist needs</p> |
| <ul style="list-style-type: none"> • Support expressed towards this policy, specifically on the drive to enhance accessibility in all residential and commercial floorspace. • The requirement for wheelchair user dwellings must apply to all tenures and the wheelchair user dwellings distributed to provide a range of floor level locations, views and unit sizes. • Support for the at least 10% of housing meeting M4(3) and the design and access standards in Table 5. • The policy is limited to wheelchair housing and should be titled as such. • The policy cannot limit itself to 10% of homes dedicated to wheelchair users. • The 10% requirement for homes to be constructed to Part M4 (3) is in conformity with the current London Plan. <p>Legality of the plan</p> <ul style="list-style-type: none"> • This policy is unsound on accessibility issues, because all other new build housing must meet requirement M4(2) for accessible and adaptable dwellings. • To make the policy sound, the wording in the policy must make clear that step |

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| <p>free access in the dwelling (lifts) will be provided.</p> <ul style="list-style-type: none"> The policy is unsound as it does not include other households with specialist needs. In particular, it fails to either protect existing Gypsy and Traveller sites or plan to meet the need for more Gypsy and Traveller pitches. |
| <p>P7 Houses in multiple occupation</p> |
| <p>N/A</p> |
| <p>P8 Supported housing and hostels</p> |
| <ul style="list-style-type: none"> Criteria 2.1-2.3 are discriminatory as they fail to provide evidence on supported housing needs in Southwark. The policy should commit to undertake assessments of the short term and long term needs for supported housing, auditing existing provision, identifying shortages in capacity and then planning to meet this need. <p>Legality of the plan</p> <ul style="list-style-type: none"> This policy is unsound because it only refers to hostels. To make this policy sound, it needs to include reference to accommodation for young people, rough sleepers, victims of domestic abuse, people with mental health issues, those discharged from hospital with support needs, those leaving prison. |
| <p>P9 Optimising delivery of new homes</p> |
| <ul style="list-style-type: none"> Policy is considered to be overly restrictive and greater flexibility should be introduced to ensure the delivery of residential units can be optimised. The density matrix should be retained and additional wording to be added to the policy as follows: "Development must be within the residential density ranges" other than in "exceptional circumstances". The policy must include details from Lifetime Neighbourhood's Policy 7.1 of the current London Plan. Figure 2 needs to be updated to show the Old Kent Road Area Action Plan Core Area. Policy should be amended to allow higher densities where supported by design led approach, detailed design scrutiny and appropriate management plan. Policy should be amended to include a criterion which seeks to ensure that the applicant demonstrates that it does not undermine or prejudice regeneration of the adjoining sites coming forward. The housing target referred to on page 35 is 2,376 which is likely a typographical error as it should be 2,736 homes per year, as set in the London Plan. The following text could be included within the policy: "The highest residential densities will be encouraged and optimised in areas strategically identified for intensification and regeneration, including the CAZ and Opportunity Areas". The requirements are overly restrictive in the context of a design-led approach. The requirements under points 2.3 and 2.9 should not be exceeded and 2.11 should not be required at all. Supports the high design standards requirements set out in the policy. The density matrix should be removed to be in line with the London Plan and the adoption of a design led approach should be required. The requirement of 'winter gardens' to be provided as part of the residential amenity space should be included in the policy. The density matrix should be removed and the policy should be amended as follows: 'High density development will be supported to optimise the delivery of new homes where it |

achieves an exemplary standard of residential design...’.

- Supporting text should refer to transport accessibility and capacity.

Legality of the plan

- The policy is unsound as it fails to balance the delivery of new housing with local character, social infrastructure and green infrastructure.
- The policy is unsound and inconsistent with the London Plan.
- The policy is unsound as it fails to balance the delivery of new housing with local character, social infrastructure and green infrastructure.

P10 Self and custom build

- The barriers of providing evidence of financial resources; making efficient use of land and appropriate density should be deleted, as these are not included in the London Plan.
- A package of support systems should be added to SP2 Social Regeneration to ensure that communities are empowered.
- Commitment should be made to work with the Mayor to provide suitable support through access to expertise, partnering with smaller Housing Associations and ensuring the register is fully accessible to those local groups interested in self and custom builds.
- These policies are not effective because they do not satisfy the needs of the myriad communities in Southwark.

Legality of the plan

- This policy is unsound because it places restrictions on self and custom build.

Homes for Travellers and Gypsies

In the absence of a Travellers and Gypsies policy, the consultation summaries below were received during the consultation period for the Proposed Submission Version of the New Southwark Plan.

- The NSP is not sound as it is not in conformity with the NPPF, Planning Policy for Travellers Sites, current and emerging London Plans with regards to Gypsy and Travellers accommodation needs.
- The approach to produce a separate Gypsy and Traveller Local Plan as set out in the LDS is not justified.
- The Council has not adequately responded to submissions and suggestions made at previous consultation stages by London Gypsies and Travellers, Southwark Travellers Action Group and other local organisations.
- The policy is not based on objectively assessed need for Gypsy and Traveller accommodation.
- The Council has failed to assess the needs of Gypsy and Travellers since 2012 when the requirement was introduced in the PPTS.
- The Integrated Impact Assessment is deficient as it does not include considerations on how the lack of Gypsy and Traveller policies will affect the community.
- The Gypsy and Traveller needs assessment should have been an evidence base document to the plan.
- To make the Local Plan sound, it must actively protect existing Gypsy and Traveller sites.

SP2 Social Regeneration and design

- Better Bankside welcome point 4 and also consider that businesses should be listed.
- Linking social regeneration and planning policies is welcome but SP2 does not relate well to other relevant policies. SP2 is also confined to policies P11-P22 which do not mention people and their social relations or link between physical environments and health. Monitoring of social regeneration also needs to be included. The process of engagement also needs to be reformed.
- Historic England welcomes the objectives and suggests that SP2 could go further in supporting development that conserves and enhances the historic environment.
- Representation notes the Social Regeneration Policy adopted by the council in September 2017 should have been prepared before the NSP and that the views of the community were not considered through 'early and meaningful engagement' and local people can particularly engage with the Area Visions.
- Policies should be reviewed in light of the Social Regeneration Policy adopted in September 2017.
- Policy is not considered to be integrated properly into the NSP.
- For this policy to be sound it should identify support which will empower communities.
- Support is given to the policy and it is suggested that it could go further by stating that all development should be future proofed to enable and facilitate future development in the immediate vicinity.
- The discrepancies between SP2 and SP4 are not brought out fully in the plan. Economic diversification is essential for a community to be more resilient.
- Regeneration to revitalise neighbourhoods has been unsuccessful in new homes delivery in Rotherhithe.
- The extension and creation of open space is required to achieve SP2.
- Aspirations of local residents should not be limited to regeneration areas. There is no policy for the engagement of residents.
- Support is given to the policy.
- SP2 is not based on robust or credible evidence, SP2 is not in accordance with the requirements for clarity as set out in the NPPF, compulsory purchase should be based on well-evidenced strategies, SP2 is not lawful in the consultation that has taken place.

Legality of the Plan

- Policy is considered to be unsound because it does not make reference to impact of tall buildings on existing residents.
- Policy is considered to be unsound as although it is a welcome addition it is not translated well in the rest of the plan.
- To make this policy sound social impact assessments both as an instrument of planning policy and a requirement of major planning applications should be required. Work with Universities on longitudinal studies to monitor and evaluate what is really happening as a result to existing residents and businesses as a result of the regeneration should be undertaken. These will be reported annually and look at change over the long term (a minimum of 10 years).

P11 Design of places

- Representations would like more emphasis on Mayor's Good Growth by Design programme, Mayor's Heathy Streets Approach.
- Representation welcomes the inclusion of urban design considerations. The policy should also make specific reference as to how development proposals will add to the existing uses within the area.
- The policies do not satisfy the needs of all of the communities in Southwark.

- Policy P11 should include the wording: ‘Better reveal local distinctiveness and architectural character, and conserve and enhance the significance of the local historic environment’.
- There is a discrepancy between the policy stated and the Peckham Area Vision.
- Language used in the policy is too ambiguous.
- The design of new developments should seek to improve the environment and the policy is considered to be too prescriptive to achieve this.
- Delete the word ‘must’.
- Policy would ease the movement of vehicular traffic and this is inconsistent with the NLP and MTS.
- Reference to a site’s connectivity and accessibility by different modes of transport should be one of the considerations to which height, scale and massing should respond.

Legality of the plan

- Policy is unsound because it doesn’t take into account adverse effects of tall buildings.
- Policy is not considered to be sound because it does not carry much weight in the design of places.
- The plan is not sound because a large part of the Plan is the section of proposals for what the council wishes to see on the various site allocations it has listed and many of proposal sites have already been given full planning permission.

P12 Design Quality

- Representation notes that the level of daylight/sunlight amenity will vary depending on density and so there will not be a consistent approach across the borough.
- Representation would like more emphasis on existing borough strategy documents such as the Mayor’s Good Growth by Design programme.
- It is considered that the policies do not reflect the needs of the different cultural communities in the borough.
- Representation welcomes the requirement for all developments to provide high standards of design.
- Representation suggests that stronger reference to the character of a local historic environment should be applied.
- Sustainable design should include the adaptive re-use of existing buildings.
- The plan should more evenly distribute new residential development to take advantage of railway stations in the south of the borough.
- There should be standards to minimise impacts of tall buildings.
- Representation considers the policy to be too prescriptive.
- The policy should reference ‘adaptability’.
- Measures of standards required in the policy should be clarified.

Legality of the plan

- Plan considered to be unsound because it fails to take on the emerging policies and proposals contained in the Draft London Plan.
- Several representations consider consultation to be lacking throughout the plan.

P13 Residential design (now an amended policy)

- Residential design standards should also refer to the protection of the amenity of existing and future occupiers.
- Further clarification is needed on the quality and the exact requirements of playspace provision.
- The residential design standards are too prescriptive.
- Objection to the requirement to share entrances between market and affordable apartment blocks.

- Wording should be amended to allow a small proportion of single aspect dwellings to be provided, as due to site constraints it is not always possible to provide 100% dual aspect units.
- Objection to the failure to require larger predominantly residential developments to include smaller scale workspaces within their schemes.
- The following suggested wording should be included in the policy: '2.5 m minimum head height should be provided for all habitable rooms, including bedrooms and living areas'.
- The requirements on single/dual aspect dwellings are more onerous than the standards adopted in the GLA's Housing SPG (2016).
- The policy should align with the Mayor of London Housing SPG, and the internal space standards ought to be flexibly applied.
- The word 'must' should be deleted.

Legality of the Plan

- Policy is unsound, unreasonable and not sufficiently flexible to allow for the practical difficulties that can mean that it is not viable to provide shared tenure entrances to apartment blocks.

P14 Tall buildings (now an amended policy)

- Many respondents highlighted the importance of clarifying where tall buildings will be located and this should be consulted on. It should be made clear that a tall building outside of the identified sites would be inappropriate. Some suggested locating them in the regeneration areas is flawed as these are not necessarily the right locations as they could destroy the character of those areas rather than enhancing them. Any proposal for a tall building outside of where the plan specifies should be subject to extensive public consultation.
- A representation suggests that the council should specifically consider planned public transport connectivity and capacity when deciding on locations for tall buildings. Tall buildings should be directed towards Opportunity Areas.
- 'Tall building' should be defined.
- The policy should identify specific sites in the borough where tall buildings are appropriate.
- The policy does not determine what "a point of townscape significance" is or what "proportionate" is.
- Tall buildings are more appropriate outside of town centres where it is possible to develop new centres with their own character.
- The approach proposed is dangerously flexible and will encourage speculative development across many sites in the borough which needs to be developed for genuine uses within realistic timetables for implementation. Terminology needs to be tightened and the language used is too vague. Language such as 'respond positively to local character' is subjective and so it is unsound.
- Policy wording should be revised to better reflect the provisions of the London Plan.
- The policy needs to make clear where the clusters of tall building will be and the range of heights that will be permissible in each of these zones.
- A positive introduction to the policy would be useful setting out the merits of tall buildings, including but not limited to their positive contribution to regeneration, creation of a unique sense of place and identity.
- There is no guidance as to how the height and location of tall buildings will be assessed.
- It is considered unreasonable to have to provide a publically accessible space near or at the top of a building over 60m.
- Policy is considered to be unsound because tall buildings are not the historic norm in Southwark.

- It is considered that P14 is intended to facilitate high-rise buildings on St Thomas St.
- The policy contradicts Area Visions.
- The policy does not consider other ways of combatting the housing need without introducing the negative effects of tall buildings. The housing needs of the borough can be met through other means that do not include tall buildings.
- Any proposal for a tall building should be accompanied by adequate supporting information.
- Proposals for tall buildings need to be plan led and the NSP does not constitute a strategic or plan-led approach to development.
- The language around new tall buildings must 'avoid unacceptable harm to the significance of designated heritage assets' is not considered to be strong enough and not in line with the NPPF.
- The policy should contain text that will enable the Council to address issues created by existing tall buildings as part of redevelopment proposals.
- The policy is considered to be ineffective because it does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents.
- Representation agrees that tall buildings should not harm heritage assets but believes that this should not impede the future development potential of surrounding sites.
- Several references are made to development 'Camberwell Union' regarding the potential impacts of tall buildings on the site.
- There should be clear standards of how the negative effects of tall buildings will be mitigated.
- The Council should specifically consider planned public transport connectivity and capacity improvements when determining the accessibility of a location.
- Several representations welcome the proposals outlined in P14.
- The policy is not based on credible or robust evidence.
- The removal of the 8 and 10 storey height restrictions for residential and commercial tall buildings, outside the core areas, limits the ability of the planning committee to carry out its legal functions to ensure all applications adhere to national and regional planning policies.
- The policy contradicts itself as tall buildings are not achievable alongside a requirement to give consideration to the existing character of the area.
- The council cannot judge 'exemplary architectural design' when it has approved tall buildings that do not meet this.
- The New Southwark Plan goes some way to ensuring that effective tall building development can take place within Southwark, however it must take care to not promote the refusal of applications that are have exemplary design and efficiently utilise key sites outside major centres because they do not reflect the overall form and massing of an area.

Legality of the plan

- Considered to be unsound because it makes no reference to or use of the evidence contained within, Historic England Advice Note 4.
- Considered not to be consistent with London Plan or NPPF.
- The policy is considered to be unsound because of changes to it since the previous round of consultation.
- The policy is considered to be unjustified because to fails to take account of responses identified in the Consultation Report.
- 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.

P15 Efficient use of land

- Meanwhile uses should not be included.
- Several representations consider that the policy should include a point stating that

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| <p>development should be permitted for smaller scale non-residential uses where they satisfy the other criteria.</p> <ul style="list-style-type: none"> • Several representations support the policy. |
| <p>P16 Listed buildings and structures</p> <ul style="list-style-type: none"> • Several representations find the policy to be ineffective because it does not ensure that the relevant specialist advice on the future viable use of the buildings and structures is available before a planning decision is made and that the consultation process was inadequate. • The phrase ‘unjustifiable harm’ is not considered to be strong enough. • The council should demonstrate what positive action it will take to make sure heritage assets are protected. • The policy is unsound because the Area Visions do not include reference to ‘historic assets that are irreplaceable’. • Development should require specialist assessments, consultation processes and adequate appraisals timelines. • Representation does not consider P16 to be effective because it does not ensure that the contribution of a listed building to its setting or its place within a group is clearly assessed, in order to evaluate whether these are ‘protected or enhanced’. • The NSP should identify specific sites in the borough where tall buildings are appropriate and give indicative heights. <p>Legality of the plan</p> <ul style="list-style-type: none"> • The policy is unsound because it fails to take into consideration the Draft London Plan and should better reflect the advice in the NPPF. • The Plan is considered to be unsound because it fails to take on the emerging policies and proposals contained in the Draft London Plan. It is suggested that the Plan be withdrawn pending the outcome of the EIP into the London Plan. • Several representations consider consultation to be lacking throughout the plan. |
| <p>P17 Conservation areas</p> <ul style="list-style-type: none"> • The policy is not effective because of conflicting NSP policy that seeks high density residential developments and conservation area appraisals are being ignored in planning applications in a conservation area. Additional consultation should happen if a proposal seeks to breach the prevailing heights, mass and density in a Conservation Area. • Several representations find the policy to be ineffective because it does not ensure that the relevant specialist advice on the future viable use of the buildings and structures is available before a planning decision is made and that the consultation process was inadequate. • P17 and P18 should be considered alongside Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. • The policy is not effective because the plan state under the Peckham Area Vision, which details development within a conservation area, make no reference to, or recognition of, this section of the Plan. • The policy could be strengthened by requiring more advertising and public consultation. • Densities and height of new developments should be established in conservation areas and capped at an adequate percentage or number of floors above the existing streetscape to prevent conservation areas from being overridden by disproportioned building heights and densities that destroy local character and amenity. Alternatively, appraisals for specific sites suitable for tall buildings should be presented as part of the plan. • P17 is not effective because it contradicts P14. • The policy fails to justify destruction of existing older buildings in areas that, due to significant damage in the Second World War, have very few historic buildings left. The loss of architectural heritage should be a consideration within policies P16 and P17. • Several representations consider consultation to be lacking throughout the plan. |

Legality of the plan

- The policy is unsound because it fails to take into consideration the Draft London Plan and should better reflect the advice in the NPPF. The plan should include a local list made in partnership with the local community.
- The Plan is considered to be unsound because it fails to take on the emerging policies and proposals contained in the Draft London Plan.

P18 Conservation of the historic environment and natural heritage land

- Several representations note that the policy should include a Local List made in partnership with the local community. It is suggested that this should be achieved through a Heritage SPD as recognised by Historic England.
- It is suggested that a community engagement policy is developed to encourage local neighbourhoods to develop a local process with an existing community group or a new group to nominate buildings for the Local List.
- Policy P17 and P18 should be considered alongside Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) to bring consistency in approach.
- The policy should better reflect the advice in the NPPF.
- Representation supports the positive approach to the importance of Southwark's historic environment and key views and supports recognition of placemarks in the London Bridge Area Vision. Placemarks should be included in P18 and P19.
- Policy is not consistent with P14 Tall Buildings.

Legality of the plan:

- Several representations find the plan to be unsound because it is considered to be inconsistent with the NPPF regarding Local Lists.
- Several representations consider consultation to be lacking throughout the plan.

P19 Borough views

- Borough views policy should consider the views of adjoining boroughs as they cross Southwark, in particular Lambeth.
- Some views have not been incorporated into the policy such as views of Southwark Cathedral and it is suggested that a SPD is produced to give clearer understanding of views.
- Support from representation regarding the inclusion of a policy relating to views relevant to other boroughs, strategic views and wider views.
- Representations consider the policy to not be positively prepared because it does not afford protection to the London panorama as seen when looking north from the rooftops of the Peckham Multi Storey building and the Bussey building in Peckham town centre.
- Representation expresses concern that the redevelopment of the former car pound site in the Old Kent Road would be compromised by the proposed borough view from Nunhead Cemetery to St Pauls Cathedral.
- Representation noted that the location identified as suitable for tall buildings in the Local Plan and area strategies must consider the location of the background area of the strategic views as well as the area covered by Southwark's local views and that further refinement of the view coordinates could be undertaken to more closely apply the LVMF approach.
- Representation suggests removing the reference to 'positively enhance significant landmarks and townscape' in order to strike a balance between regeneration and policy related to views.
- Representation suggests the word 'must' is removed from the policy and to reference the LVMF. It is suggested that the word 'must' is replaced with 'maintain'.
- Representation expresses concern that the redevelopment potential of the Bricklayers Arms

SP2 Proposed Submission Version

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| <p>Distribution Centre is in part compromised by the proposed 'Borough View' from Nunhead Cemetery to St Pauls Cathedral.</p> <ul style="list-style-type: none">• Representation expresses concern that the redevelopment potential of Southernwood Retail Park is in part compromised by the proposed 'Borough View' from Nunhead Cemetery to St Pauls Cathedral.• Representation supports the positive approach to the importance of Southwark's historic environment and key views and supports recognition of placemarks in the London Bridge Area Vision. Placemarks should be included in P18 and P19. <p>Legality of the plan</p> <ul style="list-style-type: none">• Plan considered to be unsound because it fails to take on the emerging policies and proposals contained in the Draft London Plan.• Several representations consider consultation to be lacking throughout the plan. |
| P20 Archaeology |
| n/a |
| P21 World Heritage Sites |
| <ul style="list-style-type: none">• The inclusion of reference to three world heritage sites is welcomed but requires further detail regarding the Statement of Outstanding Value for each site.• Following the review of the London Plan the policies in Borough Plans will have to be tightened. <p>Legality of the plan</p> <ul style="list-style-type: none">• The Plan is considered to be unsound because it fails to take on the emerging policies and proposals contained in the Draft London Plan. |
| P22 River Thames |
| <ul style="list-style-type: none">• Policy not considered to be positively prepared and it is suggested that the river is designated as an Ancient Schedule Monument or Grade 1 listed.• Support for the policy which is considered to be well-written with clear recommendations for new developments adjacent to the Thames Tidal Flood Defences. It is suggested that the policy should align with the Thames Estuary 2100 Plan.• Support for the policy is given by Lewisham.• The Port of London Authority (PLA) supports the inclusion of the policy but objects to the creation of new access points. The PLA must also be consulted on any proposals regarding the future provision of landmarks alongside the river.• It is suggested that the policy be strengthened to support the Thames Esplanade.• It is suggested that there is an inclusion of marine planning in line with the NPPF and Marine and Coastal Access Act. <p>Legality of the plan</p> <ul style="list-style-type: none">• The plan is considered to be inconsistent with national policy and the London Plan. |

SP3 Best start in life

- One respondent notes that SP3 Best Start in Life mentions childcare, playspace, library access but the DM policies only cover education places and student homes.
- Representation considers that the NSP should recognise the need to increase the opportunity for children to travel independently.
- Representation considers that SP3 should focus more on affordability and school/care facilities should be linked to nature so that children can access green spaces. It is also suggested that there should be joint development of nurseries and care homes.

Legality of the Plan:

- The NSP is not properly prepared as it fails to recognise the critical need to increase opportunity for Southwark’s children to travel independently.

P23 Education places

- Representation would like the NSP to specify how school places will be provided for by a new development and ensure that education contributions by developers are sufficient to cover the increasing demand for school places.
- Clear minimum requirements for family homes should be reflected in the document and P23 should make clear that development should not reduce the number of education places.
- Respondent considers that the language use in P23 is too vague and that the definition of ‘education places’ is unclear. The policy should make clear that education places include children of ages.
- Reference Southwark’s anticipated pipeline of school developments and extensions should be included.
- Suggestion to reword policy to: and support safe, healthy travel by pupils.
- Sport England notes that the development of a school should not compromise open space.
- Placemaking principles should be used in the development of new educational facilities and members of the community should have access to the facilities provided by new educational developments.
- Respondent expresses support for the policy.

P24 Student homes

- Several respondents question the requirement for the number of wheelchair accessible rooms and consider the requirement to be overly onerous.
- Several respondents consider that the proposed affordable student accommodation requirement is too high and not viable. It is suggested that the requirement will restrict the future delivery of high quality schemes. Representations consider that the assumptions set out in New Southwark Plan Evidence base: Housing Policy Viability Study (September 2015) lack transparency and key detail. It is suggested that considering student housing is similar to “built to rent” the same level of flexibility over affordable housing contributions should be extended to student housing schemes.
- Representation requests clarity on the meaning of ‘affordable rent’ for students within purpose-built student accommodation schemes. It is also not clear if the policy requires 35% affordable housing as well as 27% at discount market rent.
- The requirement to provide conventional affordable housing as part of purpose built student housing schemes is not justified and conflicts with regional planning policy.
- P24 should be more in line with the draft London Plan, particularly regarding affordable student housing.
- Support the removal of any specified location for student accommodation.
- The Council’s approach to not seek provision of affordable student homes in nominated, and we assume directly owned, schemes is strongly supported.

SP3 Proposed Submission Version

- Representations consider that the NSP should reflect the new London Plan policy H3 whereby three bedrooms of student housing in non-self contained schemes should equate to one unit of C3 conventional housing.
- A respondent expresses concern that there is no policy referring to co-living. It is suggested that this concept should be introduced with a clear set of standards which includes sites should be located near to public transport, proposals should demonstrate that a specific housing need is being met, a user profile should be developed so that it is not just occupied by students and there should be a requirement for a management plan. It is also suggested that these schemes either use a discount market rent approach or a financial payment to achieve affordable housing requirements .
- A representation wants the inclusion of support for the use of student accommodation during vacation periods.
- A representation notes that the NSP should better reflect the benefits student housing can bring to the borough including the freeing up of private rental properties and the contribution to the local economy through spending in local services.

SP4 Strong Local Economy

- The policy should require that the delivery of new affordable business units should form part of a formal viability assessment.
- The policy fails to recognise BIDs operating within Southwark.
- The policy fails to make provisions for street traders.
- Critical of the lack of protection for activity and vitality associated with street traders.
- The Mayor welcomes this policy and states that it is line with Draft Policy E2.
- The loss of industrial land is not compliant with the London Plan.
- Objections raised regarding the failure to designate CEZs in Southwark.
- Support outlined for the focus on opportunities for residents.
- The new 'New Workspace Requirements Checklist' suggested within the OKRAAP should be placed within the New Southwark Plan.
- Objections raised regarding the failure to objectively assess and define the business and other development needs of Southwark.
- Prospective sites to promote employment are causing a loss of industrial land, this is in conflict with the London Plan.
- The new 'New Workspace Requirements Checklist' suggested within the OKRAAP should be placed within the New Southwark Plan.
- Objections made regarding failure to meet business and other development needs, and the balance of land uses.
- Objections to failure to recognise testing of viability in the evidence base.
- Failure to effectively engage with businesses and neighbouring authorities during preparation of the NSP.

Legality concerns:

- The policy is not sound because it makes incorrect assumptions about town centres and high streets.
- SP4 objectives are not fully brought out in the policies and are ineffective, and therefore unsound.
- SP4 is unsound because it is not based on up to date and relevant evidence and there has been no review of available land.

P25 Strategic Protected Industrial Land

- Failure to protect current industrial sites and critical of lack of attempts to integrate industry into mixed use areas.
- Support the consolidation of Strategic Industrial Land into more focused areas.
- Further justification is needed for the reduction in SPIL designations.
- Lack of clarity as to how Southwark will retain its industrial capacity.
- Objections to insufficient extent of industrial land designation across Southwark.
- Failure to define requirements for industrial accommodation.
- Failure to designate industrial sites as protected industrial land.
- Failure to justify reduction of SPIL designated industrial land.
- Object to insufficient extent of industrial land designation across Southwark through SPIL and LSIS.
- Object to failure to define requirements for industrial accommodation within mixed use development on sites that are currently SPIL and LSIS.
- Object to failure to justify reduction of SPIL designated industrial land.
- Object to failure to indicate the site of the Integrated Waste Management Facility as SPIL.
- Object to failure to identify and protect sufficient capacity for industry and logistics within or close to the CAZ to support the needs of businesses and activities within that area, as the London Plan requires.

- The policy should ensure that there will be no net loss of industrial floorspace capacity within the OKR Opportunity Area.
- Object to failure to ensure that workspace for the existing creative industries in the OKR Opportunity Area will be protected and supported.
- Objection to title of SIL as SPIL.
- Concerns that developer-led regeneration will quash creative industries and identity of local areas.
- Documents are generally sound.
- Approach to SPIL supported.
- Object to failure to objectively assess and define the business and other development needs of Southwark and object to lack of evidence base.
- Object to failure to require re-provision of industrial capacity through the process of redevelopment.
- Object to failure to give clear indication of the scale and geography of industrial intensification, co-location and substitution required in the borough.
- Object to inadequate range of industrial accommodation.

Legality concerns:

- Policy is unsound because it does not mention or justify the reduction of SPIL designations, does not justify the abandonment of LSIS policies and site designations, ignores evidence for industrial land in the borough and does not conform with the policy in the draft new London Plan.

P26 Office and business development

- Critical of lack of policy protection for non-designated industrial sites.
- Concerns raised over it not being feasible to demonstrate through a marketing exercise for two years, the feasibility of the retention or uplift in employment floorspace.
- The need to submit marketing strategy for the use and occupation of new employment floorspace does not appear to be justified.
- Proposed two year marketing period required in order to justify a loss of office and business floorspace is unnecessarily restrictive and places an inequitable financial burden on charity landowners.
- Marketing exercise is not specific enough.
- Critical of focus on floorspace and not jobs.
- Supports intent to support office and business development in the CAZ, town centres and opportunity areas in particular.
- Critical of restrictiveness of the marketing strategy.
- Critical of restrictions in policy that could impact on future development of existing employment sites.
- Criticisms of lack of clarity in the draft NSP as to how Southwark will retain its industrial capacity.
- Objections surrounding retaining or increasing requirement to apply to accommodation type not just floorspace.
- Respondent strongly supports the positive approach to accommodating a growing market for business uses in Policy P26.
- Emphasis on office, retail and cultural development in London Bridge should be reaffirmed and explicitly prioritise office, retail and cultural development over residential in appropriate areas of the borough.
- The evidence base is not convincing.
- The New Southwark Plan should provide the same policy protection to non-designated employment generating sites as those sites within the CAZ and SIL's.
- Object to the failure to state that the retention or increase requirement defined in 1.1 will apply to accommodation type, not just to floorspace.

- Object to 1.1 only applying on-site, as this would cause a reduction in employment floorspace.
- Support for Policy P26 'Office and business development' requiring development to retain or re-provide existing employment floorspace in town centres, opportunity areas and Central Activities Zones.
- Support approach to office and business development and promotion of integration of homes and employment space.
- Criticise the retention or enhancement of employment use based on gross internal floorspace as it will significantly impact on the ability for these sites to come forward in the future.
- Issues about ability to release employment floorspace.
- Storage and access areas should also receive the same level of protection as employment floorspace.

Legality concerns:

- Plan is not sound because the increase of employment floorspace is restricted to CAZ, town centres, opportunity areas and where specified in site allocations, critical of failure to state that the retain or increase requirement in 1.1 will apply to accommodation type, not just floorspace, critical of that fact this excludes yards, and critical that exceptions are allowed in some circumstances without an off-site compensatory requirement.

P27 Railway Arches

- Policy should recognise the economic potential offered by the unlocking of the Low Line.
- The Mayor supports this policy, as arches can provide spaces for low cost business space.
- Critical of the fact that industrial uses are not prioritised in railway arches.
- Object to failure to designate most areas of railway arch accommodation as SPIL and LSIS.
- Object to failure to define the scope of P27 on the Policies Map.
- Change of use in arches to other use classes may result in reduction of industrial accommodation.
- Railway arches should be an economic opportunity as well as a public realm one.

P28 Affordable Workspace

- P28 should be subject to viability testing.
- A distinction needs to be made between small businesses who choose to relocate and those which have been displaced.
- The policy should make it clear that retention of/reprovision of employment floorspace will only be required where evidence indicates there is a market demand and it will represent a viable use of the site.
- Concerns raised that if small and independent businesses are not retained then permission will be refused, and this creates barriers for regeneration schemes.
- Reference needs to be made to a range of use types, and a range of accommodation size within the policy.
- The policy should be more flexible to accommodate a range of needs.
- There is no evidence base setting out how the thresholds of business size have been defined.
- The policy fails to recognise both those with specialist needs and those without.
- Critical of the fact that residential is the only use named within mixed use development.
- Critical of the failure to adequately define the range of accommodation that suits the full range of businesses.
- The policy only refers to B use class not A use class.

- Critical of the fact there is no plan to strengthen retention or re-provision when addressing displacement, this needs to be stronger.
- Concerns over deliverability of commitment to independent small traders.

Legality concerns:

- Wording should be added to include design specifications and the full range of accommodation should be defined to improve the soundness of this policy.
- Mixed use improperly defined, range of accommodation improperly defined, and role of less specialist owners no defined and the exclusion of small branch businesses makes the plan unsound.

P29 Small Shops

- Policy is too restrictive on developments proposing 2,500 sq.m GIA or more of retail space provide at least 10% of this space as small shops.
- Retail capacity study is not robust enough.
- Policy is ineffective because it fails to define what a small shop is.
- Object to restriction of policy application to town centres, without justification.
- Object to failure to preclude residential use when it has been demonstrated there is no demand for continued shop use.
- Object to failure to adequately define the scope of a shop, such as the policy requires to be retained or re-provided.
- It is not clear whether the requirements of Policy 29 would apply where proposals seek the replacement of existing retail floorspace.
- Concerns that it may not always be appropriate for a development to provide or retain small shops in terms of vitality in town centres.
- Small shops is too imprecise and leads to food and drink providers and chains.

Legality concerns:

- This policy is unsound because it sets a too high threshold for the provision of at least 10% small shops.
- The policy is unsound because it is not effective as it is inconsistent.

P30 Town and local centres

- Retail Capacity Study is not robust enough.
- Southwark Retail Study is weakened by the fact it was done in 2015.
- Inappropriate designation of Bankside and the Borough within the Town Centre Hierarchy.
- Oppose deletion of East Street as a local centre.
- Non-conformity of some proposed town centre designations – namely Canada Water, Old Kent Road and Herne Hill.
- Critical of location and distribution of smaller and larger retail outlets in the OKR – perhaps need to be aware of for OKRAAP.
- Object to failure to recognise and inclusively designate a significant proportion of the borough's existing high street settings as town centres.
- Object to failure to inclusively designate Local Town Centre and Neighbourhood Centre extents.
- Objects to the fact that land uses in town centres are not clearly defined.
- Object to failure to define key design parameters for development within town centres.
- Object to failure to designate existing high streets as town centres.
- Object to failure to require retention or re-provision of market uses, and their enhancement.
- District Town Centre classification is not soundly based.
- Emphasis has unduly been put on Old Kent Road, Canada Water and Peckham as areas for growth, it has ignored London Bridge as an area for growth and its capacity

for limited amenity impacts of growth here.

- Respondent supports Council commitment to preserve the vitality and viability of town centres.
- Sub-section 4 should provide further definition of what uses are considered to offer “activity” at ground floor in the policy’s justification text.
- Criticism of use of defining areas of high football as a basis for this policy.
- Failure to protect the oldest shopping parade on Camberwell New Road (225-253).

Legality concerns:

- This policy is not sound because it has not given appropriate guidance for parking in town centres.
- This policy is unsound because no new local centres have been created in the middle of the borough, where BAME communities rely disproportionately on local business opportunities.

P31 Development outside town centres

- Critical of town centre uses as opposed to major town centre uses.
- Support noted for ensuring development outside of the town centre will not harm the vitality and viability of town centres.

P32 Protected Shopping Frontages

- Critical of lack of robustness of Retail Capacity Study (made on every relevant policy).
- Concerns about creation of voids and damage to vitality of high streets because of a requirement to market the property for Class A1 use for a minimum period of two years.
- Recommends that the loss of Class A1 floorspace is not determined solely on marketing evidence, but instead is assessed by taking into account local and wider market conditions, and the economic and public benefits to introducing alternatives uses.
- Critical of methodology of shopping frontages as calculations do not take into account whether a shop is an outlier or part of an integrated shopping parade, or its age and therefore its inconsistency with town centre designations.

Legality concerns:

- Policy is generally sound because it takes a nuanced approach to protecting retail.

P33 Shops outside protected shopping frontages, town and local centres

- The policy should include sufficient flexibility to allow for the loss of retail floorspace outside defined centres where this accords with the Council’s aspirations for the reimagining of the Old Kent Road as set out within the emerging AAP.
- Requires a more robust retail study.
- The policy is weakened by scope for ambiguity and challenge.
- Should be referencing expectation for new development.
- Failure to define the scope of P33 on the Policies Map, by outlining each of the shops and associated accommodation to which this applies.
- Shops should be more clearly defined and demonstrate what it should entail.
- Object to failure to include any reference to expectation for new development.
- The provision of two years marketing evidence is a disproportionate length of time.

P34 Shop fronts

- Policy conflicts with regulation.
- Policy is too prescriptive and therefore not compliant with paragraph 60 of the NPPF.
- Client supports the Council’s objectives of improving design and appearance of town centres within the borough.
- The Rye Lane Conservation Area appraisal values the vitality of the open shop fronts.

- The policy should intervene to ensure the frontages of shops are maintained.

Legality concerns:

- This policy is unsound because there is no published evidence to support the policy and the Rye Lane Conservation Area appraisal values the vitality of the open shop fronts.

P35 Betting shops, pawnbrokers and payday loan shops

- The respondent does not consider it appropriate that betting shops, payday loan companies and pawnbrokers are grouped together. There are concerns that by grouping it, it will encourage these uses outside of town centres.
- No new evidence has been produced that identifies saturation levels.
- Concerns that the policy is too restrictive and will reduce or restrict the number of betting shops, pawnbrokers and payday loan shops.
- The evidence base is not robust or credible.
- The policy does not allow for healthy competition amongst these types of shops.

P36 Hotels and other visitor accommodation

- There are no representations submitted.

P37 Pubs

- The Mayor welcomes the inclusion of a pub protection policy which is in line with draft London Plan Policy HC7 Protecting public houses.
- The policy should be strengthened to ensure no further loss of pubs.
- Criticise the “no market demand for pub use” section of the change of use policy because it fails to protect perceived heritage assets.

P38 Business Relocation

- Plan’s approach to dealing with existing tenants in P38 is too rigid and ignores the commercial realities of developers.
- The policy should not apply when small businesses decide to move of their own accord.
- Planning system is not there to protect commercial interest, it is too restrictive.
- What are the timescales and further requirements of relocation, and there are concerns it will delay the development process.
- This policy extends beyond normal planning policy considerations.
- Support for the relocation strategy.
- The policy crossover over into Landlord Tenant Act relating to the provision of alternative accommodation.
- Policy places significant burden on the applicant.
- Policy goes beyond control of the planning system.
- Provisions needs to be made for the protection of market traders, need for specialist advice and support and a need for a relocation package and engagement with existing traders.
- The policy is not flexible enough to meet market signals.
- Lack of clarity in the policy.
- A degree of flexible needs to be able to be applied where need if it is demonstrably unviable.
- For policy to be sound, needs to be more specific requirements of how business relocation works.
- Term displacement needs to be defined and it is not compliant with the NPPF.

P39 Access to employment and training

- Critical of provision of financial contribution towards training and jobs for local people, it is unnecessary.
- The policy be clear that it applies to employment schemes.

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| P40 Outdoor advertisements and signage |
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| <ul style="list-style-type: none">• Content of advertisements is not permitted to be controlled in regulations unless required in the interests of amenity or public safety.• Policy is overly prescriptive and therefore not compliant with London Plan. |
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| P41 Broadband and digital infrastructure |
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| <ul style="list-style-type: none">• There are no representations submitted. |
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SP5 Healthy, active lives

- Walking should be included within the policy to make it consistent with Policy G3 of the new London Plan. A stated aim to ‘increase and protect’ green spaces should also be included.
- Car ownership is on a trend of growth in Southwark e.g. Camberwell since 2013. There is no commitment to gather data on local shopping habits by transport mode (including driving to supermarkets), or to assess the impact of local kerbside car storage on local walking and cycling take-up.
- A stronger link should be drawn between SP2 and SP5, in order to strengthen SP2.
- In order to ensure community resilience, within the policy a commitment to mixed tenure housing and mixed communities should be stated; ‘partners’ should also be defined.
- More reference should be made to providing high quality cycle routes.
- A specific policy should be included to define the Peckham Coal Line with reference to a boundary plan with an explanation of the project and its aims. This will make the NSP sound by clarifying what the PCL is in order that this stated aim can actually be delivered.

Legality of the plan:

- There is little evidence to support the move to a car-free borough, which makes the policy unsound.
- The strategic priorities are unsound because they are not effective. The dependencies between SP2 (Social regeneration to revitalise neighbourhoods) and SP4 (Strong local economy) are not brought out fully in the Plan.
- To make the policy sound, the following changes should be included:
 - 6 Delivering world class conditions for walking and cycling, including a comprehensive safer cycling network that is convenient and safe to use from the age of 8 to 80 ; and
 - 7 Improving and extending our network of green spaces;
 - 9 Introducing the concept of active design which, among other things, makes using the stairs an attractive alternative to using lifts and encourages the use of bicycles on local trips.

P42: Healthy developments

Legality of the plan:

- In order to make the plan sound, the policy should require health impact assessments for all development proposals to consider the impact of different forms of transport. Plans should be assessed against Transport for London guidance.

P43: Leisure, arts and culture

- The policy should make better reference to the needs of the LGBT+ community and provide guidance on the retention of venues for this group.
- The Creative Southwark Cultural Strategy 2017 to 2022 is too weak on specifics to act as support for this policy, and transport needs for tourists and users of artistic and cultural facilities needs to be better thought through.
- Objection to the failure to define the scope of P43 on the Policies Map.
- Welcome the strength of the policy to ensure that Southwark’s valued cultural facilities are retained, and that new ones are supported.
- The marketing exercise must show a realistic rental / sale value for the existing use (a minor amendment recommendation).

Legality of the plan:

- Insufficient protection is given to sports facilities in the borough in conflict with NPPF guidance.
- Failure to define the scope of P43 on the Policies Map, by outlining each of the shops and associated accommodation to which this applies makes the plan unsound as it is not justified, nor is it consistent with national policy, each in the ways required by the NPPF or

the London Plan.

P44: Community uses

- The 'exceptional circumstances' phrasing should be removed and the assessment must shown that there is no longer a need for a facility (remove the 'may no longer be a need').
- The marketing assessment is too strict and may have a negative impact on ability to provide housing in the surrounding area.
- The protection and support for leisure, arts and culture development is welcome.
- Consideration must be given to the variety of community spaces offered to ensure they meet the varied requirements of different groups.
- A new assessment of existing and potential future need for community space in the borough should be undertaken which clearly lists all groups, stakeholders and service providers.
- Objection to the failure to define the scope of P44 on the Policies Map.
- The Council must undertake a complete built sports facilities strategy.
- The 2 year marketing period will not provide sufficient protection for sports facilities and is not compliant with national planning policy.
- P44 sentence 1 should be strengthened with words to the effect: 1. New community facilities (Use Class D1, D2 and Sui Generis) will be supported where provision is made for the facility to be used by all members of the community.
- Welcome the policy but recommend an amendment to include realistic rental/sale value as part of the marketing evidence.

Legality of the plan:

- This policy is not sound because it has omitted a policy to provide explicitly for community social spaces. There needs to be an explicit policy which meets this important but neglected community need.

P45: Hot food takeaways

- Limiting the concentration and proximity to local secondary age schools of hot food takeaways would be unsound as dietary choices should not be influenced by the planning system. There is inadequate evidence that locating any A5 use within certain distances of secondary age schools causes adverse health consequences or that this would be effective in discouraging visits.
- Investment in business should not be over-burdened by the combined requirements of planning policy expectations.
- No consideration has been given to other A class uses and their contribution or impact on daily diet or wellbeing.

Legality of the plan:

- Restricting the concentration and proximity of hot food takeaways to local secondary age schools would be unsound and fails to meet the four tests of the Framework.
- It is not a positive approach to planning; justified; effective; or consistent with national planning policy.

P46: Public transport

- It would be helpful if Policy P46 included more reference to the future accessibility of a site and the future capacity in public transport once proposed changes to infrastructure are delivered.
- The policy should go further in explicitly acknowledging that proposed transport infrastructure improvements, for example the BLE, will be a material consideration in evaluating the capacity of a development site.
- The policy could be made stronger by specifically referring to all types of public transport

that operates in the borough, including the riverbus services.

- The policy or supporting text could be strengthened further by stating that development would be expected to fund capacity improvements to public transport should there be an identified capacity constraint issue.
- Routes have been cut out of the 2015 Southwark Cycling Strategy without any reason given.
- It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark.
- The plan requires a statement of commitment from Transport for London.
- The policy is supported in its current form.

Legality of the plan:

- The plan is not legally sound as it fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan, it is not justified by evidence, and it is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark.

P47: Highways impact

- Criterion (5) of this policy states that all deliveries and servicing for large development sites must take place within development sites and not on the public highway. It is considered that this blanket approach is not necessarily appropriate, particularly for large-scale, masterplanned schemes where a managed approach to on-street servicing might be entirely appropriate, and allow for the optimisation of development capacity and density.
- There is no clear definition of what constitutes large development.
- Mention could be made here in the supporting text of the Mayor's 'Vision Zero' (and/or the Council's own targets) for road casualty reduction.
- There is very little mention about the licensed taxi trade in the report and yet this must be a key part of the transport infrastructure.
- The policy is supported in its current form.
- The plan should reduce motor traffic and should include tough policies on developers to ensure construction does not endanger people cycling and walking.

Legality of the plan:

- This policy is not based on up-to-date evidence, conflicts with London-wide policy to reduce the dominance of motor vehicles, lacks objective standards to make it effective and is not planned positively to reduce motor traffic.

P48: Walking

- The Thames Path must be mentioned alongside the Green Chain walking route under point 5 of the policy, to ensure this receives a high priority in the plan.
- A walking strategy for the borough should be produced.
- This policy could specify that larger developments should provide pedestrian wayfinding, such as Legible London.
- The supporting text or ideally the policy itself could specifically mention the Healthy Streets Approach in line with Mayor's Transport Strategy.
- Welcome all commitments to enhance connectivity.

P49: Low line routes

- A specific policy should be introduced that defines the Peckham Coal Line with reference to a boundary plan with an explanation of the project and its aims; or, specific reference within P49 should be made to the PCL including the addition of the PCL to the existing policy map.
- The policy should be supplemented with further detail so the implications on specific sites for delivery of the Low Line are properly understood.
- The supporting text could mention that the Low Line routes are, in places, cycle routes also.

- Welcome recognition of the low line route close to the borough boundary with Lewisham.
- Development of Low Line routes across the borough is in principle supported.

Legality of the plan:

- Introducing a PCL policy would make the plan sound.

P50: Cycling

- It would be helpful if the policy could provide greater flexibility on the types and numbers of cycle stands that can be provided in developments.
- The need to cater for less ambulant cyclists can be incorporated into double stacked stands without harming the effective use of the land.
- Whilst the delivery of cycle spaces in public areas is supported generally, provision should not be detrimental to the quality of public realm proposals, especially in congested urban spaces.
- Include a map of existing and planned cycle routes.
- The evidence base is not up-to-date as the Southwark Cycling Strategy is not current.
- The draft Mayor’s Transport Strategy has more ambitious targets, additional routes and better cycle parking standards than the NSP. Annex 1 on cycle parking should be increased to at least draft MTS standards, with minimum of 2 spaces required for all developments.
- ‘Commercial’ use should be more clearly defined.
- The policy should seek coordinated cycle parking arrangements within an area to avoid the location of cycle storage in inappropriate locations, for example on pavements in busy town centre locations.
- The provision of a free cycle hire fob per dwelling is supported, but it is questioned why this will only be provided for a two-year period.

Legality of the plan:

- The policy fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan.
- In order to be sound an updated, longer-term evidence base is needed for cycling.

P51: Transport infrastructure improvements

- The policy would benefit by acknowledging “the need for joint funding and partnership working with key bodies such as the GLA, TfL and the London Borough of Lewisham in order to ensure timely delivery of the BLE, as proposed by the Mayor of London, and to work towards a clear and transparent agenda in terms of safeguarding the BLE route and delivering associated infrastructure and development sites alongside the BLE”.
- At present the policy is too ambiguous with regards to the funding and delivery of the BLE.
- The NSP should provide more detail about the proposed BLE, and link it to the phasing of proposed development in Old Kent Road.
- Reference to the proposed walking and cycling bridge from Rotherhithe to Canary Wharf is welcomed.
- Additional wording and detail should be added to the policy covering the proposed cycling and walking network, cycle hire, freight consolidation and bus priority.

P52: Car parking

- The level of on-street provision should reflect car ownership levels in the area, levels of disability and the needs of traders who rely on customers being able to park.
- The policy does not give appropriate guidance to ensure that a town centre has adequate car parking spaces for its viable functioning.
- Car parking standards should be revised to be stricter than in the draft Mayor’s Transport Strategy.
- It is contended that the removal / reduction of parking at one particular location will not

remove the desire of food shoppers to access stores by car.

- Outside of the CAZ, and to cater for infrequent trips, car club spaces may be considered appropriate in lieu of private parking.
- More specific guidance should be provided regarding electric vehicle charging points.
- A zero provision in PTAL 5-6 areas does not allow for the needs of blue badge holders and other essential car users, such as those that may need a car for work.
- To ensure that sites have the potential to help in meeting the Borough's housing need; greater flexibility should be provided within the New Southwark Plan to allow adequate re-provision of car parking within mixed use redevelopments in town centre locations.
- The requirement for electric vehicle charging points (EVCP) is supported, however, it should be clarified whether this means all parking spaces.
- No new private car parking in developments should be permitted other than disabled and car club bays.

P53: Parking standards for disabled people and mobility impaired people

- The Council may wish to review this policy in the light of the DLP parking standards and requirements.

SP6 Cleaner, greener, safer

- SP6 stated objective is to protect and improve open space. This strategic goal should be clearly stated in the first sentence and consistently applied through the detailed cleaner, greener, safer policies.
- It is crucial that more green open space is created in the borough and that this space is properly looked after. A specific aim within the policy should be to increase the amount of green open space in order to meet the needs of a growing population. This is required in line with the London Plan.
- The policy appears not to recognise the value to nature conservation and biodiversity of SINC's of local importance.
- Strong support is stated for the proposals to designate new Sites of Importance for Nature Conservation in North Southwark and other areas within the borough.
- There must be a reference to the River Thames and other waterways under point 4 of the policy in regards to protecting and improving the network of open spaces in the borough.
- Greater thought must be given to making new and existing buildings energy efficient; protecting walkways and pedestrians from motor traffic; and the use of trees to prevent flood risk and other methods of reducing flooding including drainage.
- The wording of the Strategic Policy should reinforce the importance of greenspace for people and nature.
- Support for new SINC of Borough Importance at Nursery Row Park, SINC's at Victory Community Park and Elba Place Nature Garden, Faraday Gardens, Salisbury Row Park, Surrey Square Park and Pasley Park.
- The Plan does not contain monitoring targets, Open Space designations, Sites Important for Nature Conservation and other lists of designations though these were included in the Southwark Plan 2007.

Legality of the plan:

- The policy is unsound because it is inconsistent with the draft London Plan and is also internally inconsistent.
- The policy is unsound because it is not consistent with the P56 Open Space.
- The plan is unsound because it is ineffective in addressing health and wellbeing needs of its residents.
- It is recommended that to make the policy sound, the following should be added to this policy: '3. Reducing motor traffic '
- The NSP is unsound because ancillary facilities should positively contribute to both openness and character of the open space.
- The NSP is unsound because it does not provide for replacement Other Open Space of both equivalent size and substantially better quality.

P54: Protecting of amenity

- It is recommended that reference is made to the potential conflict with NSP66 – the introduction of new uses, such as residential and offices could result in the interference with existing businesses.
- It is vital that a pragmatic approach to redevelopment and phasing is fostered – the measures which mitigate potential short and long term amenity concerns will be required to be in balance with the need to develop and allow the growth of existing and proposed businesses.
- 'Pleasant' environment should be defined within the text for clarity.

P55: Designing out crimes

N/A.

P56: Open space

- Few site allocations mention green and open space or set out the amount of space to be allocated for this use.
- There is no evidence that the Council has calculated the amount of new green space needed to provide adequately for the growing population, taking account of requirements of different ages within the population.
- Where areas have a green space deficit (as set out in Southwark’s Open Space Strategy) this should be identified in the relevant Area Vision along with a commitment to address the deficit.
- A further needs assessment of local green and open space to inform policy is advocated.
- The fact box clarifies that ‘Other open space does not include open spaces that are ancillary to, and/or within the curtilage of a building’ – it is considered that this definition is inconsistent with national policy. Southwark Council have historically designated parks which are also designated as Sites of Importance for Nature Conservation (SINCs) as at least Borough Open Land (BOL), but in the policy only sites of Borough-wide nature conservation or biodiversity value are listed as requiring the additional protection that BOL and MOL provide over Other Open Space – the least protected of the three grades.
- It is important to recognise that OOS allocations comprise smaller spaces which are of a local importance at a neighbourhood level and, therefore, should not be afforded the same level of protection as MOL and BOL.
- P56 only permits development on OOS where “exceptional circumstances” are demonstrated and this is not consistent with national policy.
- The policy should firstly seek to protect the MOL from inappropriate development but, in fulfilling its identified role, secondly allow for opportunities for such spaces to be of public value in line with paragraph 81 of national planning policy.
- The policy does not reflect the London Plan’s policy of seeking to expand “green cover” (which goes beyond open space) in the GLA area to 50%.
- Wording should be amended to ensure that consideration is given to openness and character of open space.
- Support that the OOS can be developed in exceptional circumstances.

Legality of the plan:

- The policy is inconsistent with the London Plan because the London Plan’s sections on green and open space emphasise the need for the protection and extension of green and open space - P56 only refers to restrictions on development on open space, there is no policy on extending open space.
- Policy 56 is unsound because it has not been positively prepared, taking account of the greenspace needs of current and future residents.
- The NSP is unsound because it does not provide for replacement Other Open Space of both equivalent size and substantially better quality.

P57: Open water space

- There is no definition of ‘underused’. Without a definition, any open water space without moorings could be said to be ‘underused’.
- The policy needs to start with a definition of the ‘openness’ that it seeks to preserve and improve and how that may be affected by structures and constructions, including residential houseboats and other watercraft.
- This policy must be expanded and can be made stronger. There must be reference in the policy that any development that affects designated open water spaces must ensure that all safety and navigational impacts are minimised, as noted in part 1.8 of policy P22.
- Houseboats should be supported as they contribute to meeting housing need, but the policy is unsound as it only sees houseboats as for leisure and facilities and amenities for the houseboats are not required in the policy.

- The importance of open water space in the borough for biodiversity is underplayed; there is no reference to this in the policy or the reasons.

Legality of the plan:

- The policy is unsound as it makes no reference to evidence of underuse of water space or what assessment has been made of the infrastructure required to access and service additional moorings and berths.

P58: Green infrastructure

- The additionality of green space and future management must be agreed via suitable planning legal agreements. Otherwise there is no follow through or legal grounds to take action on the planning requirements if not complied with.
- The policy fails to provide a mechanism for assessing the value of different kinds of green infrastructure. The Urban Greening Factor (London Plan) may be useful in this regard. Without such an assessment it is not possible to ensure that planning applications make sufficient provision for green infrastructure either on development sites themselves or as a contribution to other sites.
- There are no proposals setting out how green spaces could be improved or linked with green chains, in line with national and London Plan policy (e.g. G1 in draft NLP) to integrate green areas, in order to improve connectivity for nature as well as improve the attractiveness of walking and cycling.

Legality of the plan:

- The NSP is unsound because it does not provide for replacement Other Open Space of both equivalent size and substantially better quality.
- Policy 58 is unsound because it is not consistent with the SP6 on flooding and the importance of urban greening to tackle this risk.
- There is no definition of major developments or large scale major development, without which it is not possible to ensure that planning applications make sufficient provision for greenspace either on the development site or as a contribution to other sites. This impacts on the soundness of the policy.
- Policy 58 is not effective as there are no maps of where new green corridors would be created in existing and new neighbourhoods.
- The policy is unsound because there is no assessment of the borough's green infrastructure needs.

P59: Biodiversity

- It is not made clear how development will be expected to contribute to net gains in biodiversity. In the interest of soundness (and to ensure that the policy is effective), this policy should be revised to ensure that contributions will be sought on the basis of an evidence-based approach.
- By including provision for developers to pay for damage to biodiversity, the policy is made ineffective.
- The NSP should include maps showing where space for green links and buffering for biodiversity is to be created or enhanced.
- We must take greater account of our ancient and secondary woodlands.
- Development expected to contribute to net gains in biodiversity is supported, but it is not clear how contributions will be required.
- Support that developers must contribute to net gains in biodiversity.

Legality of the plan:

- This policy is not sound because it is not consistent with the current London Plan's guidance on plan preparation as part of Policy 7.19 Biodiversity and access to nature.

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| <ul style="list-style-type: none"> • The policy is ineffective because no links are made with Policy 58 on Green Infrastructure to show what kinds of green infrastructure are needed to effectively enhance biodiversity throughout the borough. • To make the Plan sound SINCS should be listed in the Plan and open to comment. |
| <p>P60: Trees</p> <ul style="list-style-type: none"> • It is requested that the loss of existing trees be treated with some flexibility. Although the unnecessary loss of important trees and landscaping is not promoted, it is required in certain instances. <p>Legality of the plan:</p> <ul style="list-style-type: none"> • Policy P60 is sound but should also consider the habitat loss for insects, birds and mammals when trees are felled and removed. |
| <p>P62: Energy</p> <ul style="list-style-type: none"> • Whilst the principles of the policy are supported, it is unclear why the draft policy requires carbon emissions to achieve a minimum of 40% on 2013 Buildings Regulations Part L up to 2019, as this deviates from existing London Plan Policy 5.2 (which requires a 40% improvement on 2010 Building Regulations Part L) and Draft London Plan Policy SI2 (which requires a 35% improvement on 2013 Building Regulations Part L) which is the same requirement detailed in the Mayor of London’s Sustainable Design and Construction SPD (2014) and “Guidance on Preparing Energy Assessments (2016). • There should be a single Part L reduction standard for the whole country and local authorities must be made to adhere to this. <p>Legality of the Plan:</p> <ul style="list-style-type: none"> • Policy P62 as currently drafted is considered to be ‘unsound’ in that it is not ‘consistent’ with either the existing or the emerging London Plan. |
| <p>P63: Reducing waste</p> <ul style="list-style-type: none"> • It must be stated in the policy that the development of sites in close proximity to the Thames must consider the use of the River for the transportation of construction materials and waste, in line with current London Plan policy 5.18 and 6.14. <p>Legality of the plan:</p> <ul style="list-style-type: none"> • The failure to safeguard waste management sites in the NSP is unsound in relation to London Plan policy 9.9.2. which states that any waste site release should be part of a planned process and that sites should only be released to other land uses where waste processing capacity is re-provided elsewhere within London. |
| <p>P66: Improving air quality</p> <ul style="list-style-type: none"> • The policy should outline additional measures for tackling the issue, not solely in relation to boiler types. • There should be recognition of the impact of behavioural change as well as physical infrastructure improvements. • Policy P66 does not mention mitigating impacts during the construction process. • Policy P66 should be strengthened by going beyond design solutions for individual buildings to support urban design solutions to reduce air quality, including public realm improvements to provide urban greening and a network of pedestrian and cycling routes free of motorised vehicles. • Policy should be amended to address the air quality implications of construction impacts. • Policy should be amended to require significant development to be Air Quality Positive in the Ultra Low Emission Zone. • New proposals are urgently needed on the Camberwell Green Road junction in relation to |

air quality and should be included as part of the Camberwell Area Vision.

Legality of the plan:

- The policy is unsound because no evidence is provided of the relative contribution of existing buildings and new developments, no discussion of measures to protect locations used by vulnerable groups (e.g. care homes, schools) or other significant measures.

P67: Reducing noise pollution and enhancing soundscapes

Legality of the plan:

- This policy is unsound because it as it makes no mention of noise pollution from unwanted street noise such as taxi ranks, late-night venues and routes home, or out of hour deliveries. P67 also does not highlight that often noise pollution can be attributed to buildings ancillary equipment such as air conditioning units.

P68: Reducing water use

- Thames Water supports the proposed policy on reducing water use. Ensuring that new development is as water efficient as possible will help to reduce the impacts on water resources and infrastructure associated with climate change and population growth.

P69: Reducing flood risk

- The policy is not consistent with Policy 58 on Reducing flood risk.
- The stated objective of SP6 is to use urban greening to reduce flood risk. This strategic goal should be applied more strongly to ensure that through Policy 58 major developments provide green space which is used strategically to tackle flood risk as well as green infrastructure.
- To tackle flood risk boroughs must collaborate across the sub-region, taking into account guidance within the London Plan; this should be clarified in the policy.
- The policy should clarify how the risk from an accumulation of basement developments should be assessed in terms of the cumulative flood risk in a specific street or area, and permeable surfaces in front gardens will be enforced to ensure that a contribution is being made to reducing flood risk.
- It is crucial that any necessary sewerage network upgrades are delivered ahead of the occupation of development. In this respect the policy may benefit from reference to the need to ensure alignment with any necessary wastewater infrastructure and compliance with Policy IP1 to ensure that development does not result in any increased risk of sewer flooding.



**NEW SOUTHWARK PLAN
PROPOSED SUBMISSION VERSION
CONSULTATION RESPONSES**

JANUARY 2020

Bankside and Borough Area Vision

- AV01.3 ‘which in many places includes residential communities’ is ambiguous and pointless as every area within the area is residential.
- The following key development opportunity sites in Bankside and The Borough were not listed: (The Sungard Building, 24 Southwark Bridge Road, Minerva House, Rose Court Riverside Court, Workspace Union Street, Inner London Crown Court, 5-11 Lavington Street).
- Better Bankside welcome changes made from the previous version, including the stated recognition of the area as a globally significant business district and that the opportunity for active frontages is now included in site allocations. They recommend the NSP gives more notice to the draft Bankside Neighbourhood Plan. They have stated it would be useful if the NSP was able to clarify how the framework of the unified Opportunity Area will work in practice alongside the differing Area Visions.
- The Port of London Authority welcomes reference in the policy to the need to improve existing and create new cycle and walk ways, specifically along the Thames Path, and the reference to river transport in the area. The PLA considers that any redevelopment of sites in close proximity to the River Thames, such as site NSP05 at 1 Southwark Bridge and Red Lion Court must consider the transportation of construction materials and waste by river, rather than by road.
- The broad vision that is set out is supported. The NSP is right to acknowledge the potential of the area for housing growth.

NSP01 Site Bordering Great Suffolk Street and Ewer Street

- The freehold owners of the River Court and the Doggett’s Coat and Badge Public House have expressed concern that their site has not been included as a site allocation and present an argument that the site represents an opportunity to contribute positively to regeneration for either residential or office uses.
- Thames Water does not envisage infrastructure concerns regarding Water Supply capability in relation to this site.

NSP02: 62-67 Park Street

- Historic England considers the policy text referring to ‘taller’ buildings to be problematic given the sensitive location of the site.
- Thames Water does not envisage infrastructure concerns regarding Water Supply capability in relation to this site.

NSP03: 185 Park Street

- Historic England considers the policy text referring to ‘taller’ buildings to be problematic given the sensitive location of the site.
- Thames Water considers that the water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development.

NSP04: London Fire and Emergency Planning Authority

- The London Fire and Emergency Planning Authority is generally supportive of this site being included as a potential development site but note some factual inaccuracies in the site allocation text including the site boundary and the size of the site.
- The Education and Skills Funding Agency supports the continued inclusion of requirements for new or expanded schools in site allocation NSP04.
- Thames Water does not envisage infrastructure concerns regarding Water Supply capability in relation to this site.
- TfL City Planning states that specific mention could be made of the need to protect/enhance CS7.

NSP05: 1 Southwark Bridge and Red Lion Court

- Historic England states that the design and accessibility text is incomplete as it fails

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| <p>to mention the close proximity of the Thrale Street conservation area at the southern edge of the site, and does not make any meaningful use of the range of heritage assets in setting out parameters to guide likely development.</p> <ul style="list-style-type: none"> • Thames Water does not envisage infrastructure concerns regarding Water Supply capability in relation to this site. • TfL City Planning states that specific mention could be made of the need to protect/enhance CS7. |
| <p>NSP06: Landmark Court</p> <ul style="list-style-type: none"> • TfL Commercial Development states that flexibility should be maintained concerning housing on site and that the 'should provide' requirements within the text should be changed to 'may provide'. They also state that the site boundary should encompass all of TfL's ownership, including the Crossbones Graveyard. • Thames Water does not envisage infrastructure concerns regarding Water Supply capability in relation to this site. • U and I Group PLC supports the proposed allocation, particularly the requirements for office provision and preference for new homes. Active frontages will improve viability along Southwark Street and encourage people to enter the site. They however state concern that the site 'must' provide affordable workspace and 'may' provide housing as in previous versions these requirements were different. They state that 'employment floorspace' should be defined by NSP06. |
| <p>NSP07: Land between Great Suffolk Street and Glasshill Street</p> <ul style="list-style-type: none"> • Thames Water does not envisage infrastructure concerns regarding Water Supply capability in relation to this site. |
| <p>NSP08: Swan Street Cluster</p> <ul style="list-style-type: none"> • Thames Water does not envisage infrastructure concerns regarding Water Supply capability in relation to this site. |
| <p>NSP09: 21 and 25-29 Harper Road</p> <ul style="list-style-type: none"> • DP9 on behalf of Southwark Homes Ltd supports the principle of the allocation and that the site can include a taller building. They are keen to ensure maximum flexibility in relation to the mixed-use development for this site and propose that a hotel may be a suitable use for the site. They support the opportunity for active frontages along Newington Causeway and Harper Road. • Thames Water does not envisage infrastructure concerns regarding Water Supply capability in relation to this site. |

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| Bermondsey – Amended Site allocation |
| NSP13 Old Jamaica Road Industrial Estate (deletion of site allocation and allocation as SPIL) |
| <ul style="list-style-type: none">• Vital OKR welcome the deletion of the site allocation and inclusion as SPIL. Object to not including the area of yard in industrial use between the railway viaduct and the back of footway on Enid Street as SPIL.• Support from the Mayor of London regarding the SPIL designation. |

Bermondsey Area Vision

- The Port of London Authority welcome the reference to improving the Thames Path and support the design and accessibility guidance for tall buildings, but consider that must be reference to promoting the use of the River Thames as an alternative sustainable mode of transport, as well as making use of the Thames for the transportation and delivery of construction materials and waste associated with any future development.

NSP10: Biscuit Factory and Campus

- A comment claims that proposals for redevelopment of the site are not justified because the views of the local residents have not been fully considered and taken into account.
- The Education and Skills Funding Agency supports the continued inclusion of requirements for new or expanded schools in the site allocation.
- The Mayor of London comments that the loss of industrial workspace is a concern, and recommends that clarification is provided for the allocation to ensure that industrial premises are provided as part of the mix of uses on this site. It would be useful for the document to state the sum total of all industrial and employment land, including floorspace that is proposed for release and any additional provision.
- Grosvenor are keen to ensure that the site allocation and private rented homes policy adequately reflect the specific site conditions and the distinct economics of delivering build to rent housing. They strongly support the proposed site allocation which aligns closely with their aspirations for the site and the current planning application. The approach to support The Blue local town centre should be stated in the site text.
- Historic England state that there are unlisted buildings of heritage merit that are of value and interest on the site and that the design section should reflect the positive contribution these buildings make and make clear that development proposals should retain them within any new scheme. They also state the guidance on tall buildings in unclear.
- Vital OKR object to the failure to define requirements for industrial accommodation within mixed-development on the site and argue that this affects the soundness of the Plan. They suggest that the allocation policies for the site be revised to include requirements for a defined minimum quantum of industrial accommodation.
- Thames Water does not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

NSP11 Tower Workshops

- A comment claims that proposals for redevelopment of the site are not justified because the views of the local residents have not been fully considered and taken into account.
- The Port of London Authority welcome the reference to improving the Thames Path and support the tall buildings guidance, but consider that there must be reference to promoting the use of the River Thames as an alternative sustainable mode of transport, as well as making use of the Thames for the transportation and delivery of construction materials and waste associated with any future development.
- Vital OKR object to the failure to define requirements for industrial accommodation within mixed-development on the site and argue that this affects the soundness of the Plan. They suggest that the allocation policies for the site be revised to include requirements for a defined minimum quantum of industrial accommodation.
- The Mayor of London comments that the loss of industrial workspace is a concern, and recommends that clarification is provided for the allocation to ensure that industrial premises are provided as part of the mix of uses on this site. It would be useful for the document to state the sum total of all industrial and employment land, including floorspace that is proposed for release and any additional provision.
- Thames Water does not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

NSP12 Chambers Wharf

- A comment claims that proposals for redevelopment of the site are not justified because the views of the local residents have not been fully considered and taken into account.
- The Port of London Authority welcome the reference to improving the Thames Path and support the tall buildings guidance, but consider that there must be reference to promoting the use of the River Thames as an alternative sustainable mode of transport, as well as making use of the Thames for the transportation and delivery of construction materials and waste associated with any future development.
- Vital OKR object to the failure to define requirements for industrial accommodation within mixed-development on the site and argue that this affects the soundness of the Plan. They suggest that the allocation policies for the site be revised to include requirements for a defined minimum quantum of industrial accommodation.
- Thames Water does not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

NSP13 Old Jamaica Road Business Estate (deleted as a site allocation in Amended Policies)

- Proposals for sites considered to be unjustified because the views of local residents was not taken into account
- Several objections to the failure to define requirements for industrial accommodation within mixed development site allocations
- Objections are raised to site being included as a site allocation as it is already a successful business estate with full occupancy and the council has not evidenced that the site is deliverable or developable
- Safestore support the proposals within NSP13 to continue to provide business space as long as the operations of businesses are not compromised by the introduction of residential uses.
- Thames Water note that water network capacity in this area may be unable to support the demand anticipated from this development. No waste water capacity concerns.
- Occupiers of the Old Jamaica Road Business Estate object to the site allocation as it was not fully consulted on and has not appeared in previous versions of the plan

Camberwell Area Vision

- One comment is strongly supportive of the Area Vision and commends the plans to open a new station, noting that this will vastly improve local transport links.
- LB Lambeth notes that a number of the site allocations in around Camberwell and Dulwich allow for the provision of new extra care homes but questions whether this need has been supported by the clinical commissioning group.
- Friends for Burgess Park note that alternative wording for the Camberwell Area Vision should specifically identify that the area around Burgess Park should retain buildings which evidence the historic industrial landscape.
- The importance of retaining and creating views and vistas to local landmarks and green spaces needs to be more positively stated than currently.
- The height and massing of buildings along the south side of Burgess Park should be specified in the Camberwell Area Plan to take account of the narrowness of the park and to avoid the park being dominated by tall buildings on all sides.
- Tall buildings may threaten the character of the area.
- There should be a commitment to a full consultation with all affected parties during the planning process for any tall building and for changes affecting small businesses.
- TfL City Planning states that the third bullet point could include specific mention of the need for development to support expansion of cycle hire into Camberwell.
- The congestion at Denmark Hill needs to be addressed.
- New proposals are urgently needed on the Camberwell Green Road junction and should be included as part of the Camberwell Area Vision.
- Existing parking should be maintained to support families, the disabled and the elderly who may not be able to use public transport.
- Only four of the development opportunity sites in the Area Vision for Camberwell make provision for public open space.

Legality of the plan:

- Several comments state that the Area Vision is not positively prepared as it does not provide adequate guidance on heritage, townscape or character.
- The Area Vision is not sound as it is not based on evidence of local car ownership and car use habits and local need for housing. A reassessment of local shopping habits and car use and the designation of a new local centre on Camberwell New Road are recommended to make the Vision sound.
- The Vision has not been positively prepared in respect to flooding and is not consistent with Policy 69. There should be evidence of the strategic goal of 'urban greening' to tackle flood risk in the area.

NSP22 Camberwell Station

- LB Lambeth recommend including the same paragraph about cross border issues that has been included NSP26. They also state that the site allocation should acknowledge that the proposed new station at Camberwell would emerge onto a residential street and that the impacts of this must be mitigated.
- TfL City Planning state that the case for a new station at Camberwell is currently being looked at by TfL, Network Rail and the Council and that the supporting text should acknowledge this.
- Thames Water does not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

Legality of the plan:

- Objections to the failure to define requirements for industrial accommodation within the mixed-development site. National and regional guidance requires local plans to meet objectively assessed needs. This impacts on the soundness of the NSP.

NSP23 Burgess Business Park

- Dolphin Living Ltd strongly supports the principles of the proposed site allocation, particularly the transition to a mixed use neighbourhood, which incorporates residential uses (Class C3). In respect of the re-provision of employment floor space, they suggest including Class B1 (b&c) as an acceptable use. Support should also be provided (within the supporting text of the site allocation) to provide scope for alternative employment generating uses.
- Friends of Burgess Park suggest that site allocation description is not effective because it does not provide sufficient local context to interpret the design policies and tall buildings policies in relation to the redevelopment of the site. They state that it is not appropriate for buildings to abut the park and reduce the light and sunlight and impact on the park trees and other plants. They suggest that the site description should require contributions to support social infrastructure such as early years provision, schools, health provision and transport and also green infrastructure.
- The GLA states that it would be useful for the document to state the sum total of all industrial and employment land, including floorspace that is proposed for release and any additional provision.
- Historic England welcomes the identification of a number of designated heritage assets on the site map and suggest the first sentence of the fifth paragraph be amended to read 'Redevelopment must conserve and enhance the setting of'.
- Objections to the failure to define requirements for industrial accommodation within the mixed-development site and suggestions that the site allocation be revised to include requirements for a defined minimum quantum of industrial accommodation.
- Thames Water does not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.
- One comment has noted that existing employment enterprises at Burgess Business Park have unrestricted working hours and that this should be preserved.
- The inclusion of tall buildings on the site will significantly and insensitively change the character of the area, both for residents and for visitors to Burgess Park.

Legality of the plan:

- One comment states that the plan is unsound due to its provisions on maximising housing units for all applications in most of the area visions and its abolition of the existing height restrictions in the current Southwark Plan, which is inconsistent with London Plan guidance. It is claimed that it will leave local residents with reduced grounds on which to lodge some very valid concerns and objections about the Burgess Business Park development.
- Peachtree Services LTD states that the requirements set out in Site Allocation NSP23: Burgess Business Park are not achievable and the Plan is therefore not effective. They suggest that the site text should be amended to remove the requirement to 're-provide at least the amount of employment floorspace (B class) currently on the site or provide at least 50% of the development as employment floorspace'. The Plan should be amended to acknowledge the rights of existing enterprises to continue to operate at Burgess Business Park without imposition of new restrictions.

NSP24 Butterfly Walk and Morrison's Car Park

- Thames Water does not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

NSP25 Valmar Trading Estate

- The GLA has recommended that clarification is provided for the allocation to ensure that industrial premises are provided as part of the mix of uses on these sites and that it would be useful for the NSP as a whole to state the sum total of all industrial and employment land, including floorspace that is proposed for release and any

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| <p>additional provision. Relocation arrangements should be put in place prior to the commencement of development to ensure that disruption to existing businesses is minimised.</p> <ul style="list-style-type: none"> • Thames Water does not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site. • Objections to the failure to define requirements for industrial accommodation within the mixed-development site and suggestions that the site allocation be revised to include requirements for a defined minimum quantum of industrial accommodation. |
| <p>NSP26 Camberwell Bus Garage</p> <ul style="list-style-type: none"> • Objections to the failure to define requirements for industrial accommodation within the mixed-development site allocation and recommend that, in order to improve NSP soundness in relation to NPPF and London Plan requirements, the allocation policies for each site be revised to include requirements for a defined minimum quantum of industrial accommodation. • LB Lambeth requests that if the bus station is considered to be surplus to requirements that any potential impacts on any service provision in Lambeth be acknowledged and mitigated as required. • TfL City Planning recommends that as it is unlikely that this bus garage will be 'surplus to requirement' within the plan period, an option for developing 'over' the garage, whilst retaining or enhancing the garage function, could be included in the site text. • Thames Water does not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site. |
| <p>NSP27 Abellio Bus Garage, Camberwell</p> <ul style="list-style-type: none"> • Objections to the failure to define requirements for industrial accommodation within the mixed-development site allocation and recommend that, in order to improve NSP soundness in relation to NPPF and London Plan requirements, the allocation policies for each site be revised to include requirements for a defined minimum quantum of industrial accommodation. • TfL City Planning has noted that the site should more accurately be called 'Walworth Bus Garage', and recommend that as it is unlikely that this bus garage will be 'surplus to requirement' within the plan period, an option for developing 'over' the garage, whilst retaining or enhancing the garage function, could be included in the site text. • TfL Commercial Development welcomes the changes to this allocation, which states that the function of the bus garage should remain, if required, as part of a residential-led development. • Thames Water does not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site. |
| <p>NSP28: Land Between Camberwell Station Road and Warner Road</p> <ul style="list-style-type: none"> • Objections to the failure to define requirements for industrial accommodation within the mixed-development site allocation and recommend that, in order to improve NSP soundness in relation to NPPF and London Plan requirements, the allocation policies for each site be revised to include requirements for a defined minimum quantum of industrial accommodation. • Thames Water does not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site. |
| <p>NSP29: Iceland, 120-132 Camberwell Road</p> <ul style="list-style-type: none"> • Crown Properties supports the site allocation for mixed use residential development but seeks to clarify the existing floor areas that are set out in the draft allocation; · Residential 342 Sqm · Commercial 1,386 Sqm. • Thames Water does not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site. |

NSP30: 49 Lomond Grove

- The GLA has recommended that clarification is provided for the allocation to ensure that industrial premises are provided as part of the mix of uses on these sites and that it would be useful for the NSP as a whole to state the sum total of all industrial and employment land, including floorspace that is proposed for release and any additional provision. Relocation arrangements should be put in place prior to the commencement of development to ensure that disruption to existing businesses is minimised.
- Objections to the failure to define requirements for industrial accommodation within the mixed-development site allocation and recommend that, in order to improve NSP soundness in relation to NPPF and London Plan requirements, the allocation policies for each site be revised to include requirements for a defined minimum quantum of industrial accommodation.
- Thames Water does not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

NSP31: 99 Lomond Grove

- BizSpace welcomes that their previous recommendations have been accepted, but have stated that the address title should in fact be 83 Lomond Grove and that the area of hard standing immediately adjacent to the northern elevation of No. 99 should be excluded from the allocation.
- Objections to the failure to define requirements for industrial accommodation within the mixed-development site allocation and recommend that, in order to improve NSP soundness in relation to NPPF and London Plan requirements, the allocation policies for each site be revised to include requirements for a defined minimum quantum of industrial accommodation.

NSP32: 123 Grove Park

- Objections to the failure to define requirements for industrial accommodation within the mixed-development site allocation and recommend that, in order to improve NSP soundness in relation to NPPF and London Plan requirements, the allocation policies for each site be revised to include requirements for a defined minimum quantum of industrial accommodation

NSP33: Camberwell Green Magistrates Court

- Her Majesty's Courts and Tribunals Service supports the proposed re-use of this site for residential use but consider that the expectation that the same amount of employment floorspace as is on the current site is not appropriate for this site, and propose that the site allocation is amended for residential development with ground floor employment uses of between 1,000-2,000 sqm. They question the financial viability of such a significant quantum of employment floorspace in this location and believe that there is a strong possibility that a large proportion of the floorspace could remain unoccupied for a long period after construction if planning policy dictates such a provision.
- Thames Water does not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.
- One comment raises concerns over the potential harmful impact of tall buildings on site to the surrounding community.

NSP34: Denmark Hill Campus East

- King's College Hospital NHS Foundation Trust supports the allocation and states that it has interpreted both the London Plan and emerging London Plan positively and that the provision of high quality health care can be further advocated with the addition of high quality, sustainable buildings that enhance the local area and improve the public realm for visitors and locals alike.
- Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its

cumulative impact.

Crystal Palace and Gipsy Hill Area Vision

- The Kingswood Network claims that there was insufficient consultation on the newly created Area Vision for Crystal Palace and Gipsy Hill. Insufficient regard has been made to consider the distinctive needs of the Kingswood Estate.
- The Education and Skills Funding Agency supports the continued inclusion of requirements for new or expanded schools within the vision.
- LB Lewisham states that it is difficult to understand the overall quantum of development being proposed. The Plan would benefit from explicitly recognising the level of anticipated growth within an overarching policy that highlights the cumulative, indicative figures for the whole borough for residential, retail and employment uses and by including a key diagram.

Legality of the plan:

- This vision is not sound because it is not consistent with National Planning Policy Framework, through failure to comply with the need for “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses” so that Local Plans reflect a “collective vision”.
- The vision is not clear and distinctive enough to enable measurement that can demonstrate delivery.

NSP35: Guys and St Thomas Trust Rehabilitation Centre, Crystal Palace

- Historic England welcomes the reference to the listed pedestrian subway but recommended the inclusion of reference to the ‘historic Grade II* Crystal Palace Park’.
- LB Lambeth states that the site vision should acknowledge the site location on the borough boundary with Lambeth and Bromley.
- Thames Water states that they do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

| Elephant and Castle Proposed Submission Version |
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| Area Vision |
| <ul style="list-style-type: none"> • The plan does not take into account the views of local residents. • The vision should include the needs of existing residents, 50% social housing, increase in green space and support for community spaces • Lawford and Sons Ltd request the inclusion of 136-142 Old Kent Road as a site allocation • TfL suggest mentioning the Bakerloo line extension and it should be noted that there are no planned improvements to the train station • Theatres Trust welcomes the recognition of the important role these areas have in terms of arts and cultural provision • There is a lack of community facilities listed in the area vision |
| NSP42 Newington Triangle |
| <ul style="list-style-type: none"> • The Elephant Amenity Network find the visions to be unsound because they are supported by evidence. They suggest that reference to new homes should include a significant number of social housing, retail provided should be a proportion of these should be replacement units for traders from site 47, open space should be referred to as green space, all sites should include small business space and community facilities • Objection to the failure to define any requirement for industrial accommodation within mixed-development (Vital OKR) • Lawford and Sons Ltd/Capital Homes consider that 136-142 New Kent Road should remain as an opportunity site • Peabody strongly support the allocation of this site for significant residential-led mixed use redevelopment • Thames Water Utilities note that the water network capacity in this area may be unable to support the demand anticipated from this development. There are no waste water infrastructure concerns. |
| NSP43 Bakerloo Line Sidings and 7 St George's Circus |
| <ul style="list-style-type: none"> • The Elephant Amenity Network find the visions to be unsound because they are supported by evidence. They suggest that reference to new homes should include a significant number of social housing, retail provided should be a proportion of these should be replacement units for traders from site 47, open space should be referred to as green space, all sites should include small business space and community facilities • Vital OKR object to the failure to define any requirement for industrial accommodation within mixed-development and notes that low-cost business space should be provided • TFL note there is no existing employment space on the site to re-provide as it is a sui generis rail depot. • Thames Water Utilities note that the water network capacity in this area may be unable to support the demand anticipated from this development. There are no waste water infrastructure concerns. |
| NSP44 63-85 Newington Causeway |
| <ul style="list-style-type: none"> • Blyford Investment and RDI Reit support the site allocation and suggest that the site is extended to the include the properties on the corner of Newington Causeway and Avonmouth Street and it is also important that redevelopment of the site could come forward in different phases. Concerns raised regarding the 50% employment requirement and the re-provision of the theatre use. • The Elephant Amenity Network consider the site unsound because the existing use includes an industrial site and yet there is no requirement for industrial accommodation • Vital OKR object to the failure to define any requirement for industrial |

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| <p>accommodation within mixed-development and notes that low-cost business space should be provided</p> <ul style="list-style-type: none"> • Thames Water Utilities note that the water network capacity in this area may be unable to support the demand anticipated from this development. There are no waste water infrastructure concerns. • Theatres Trust support the retention of the Southwark Playhouse and suggest the removal of 'subject to need'. |
| <p>NSP45 Salvation Army, Headquarters, Newington Causeway</p> <ul style="list-style-type: none"> • The Elephant Amenity Network find the visions to be unsound because they are supported by evidence. They suggest that reference to new homes should include a significant number of social housing, retail provided should be a proportion of these should be replacement units for traders from site 47, open space should be referred to as green space, all sites should include small business space and community facilities • Thames Water do not envisage infrastructure concerns • The Salvation Army Trustee Company support the principle of the site but consider the residential requirements and P9 to be too restrictive. It is also considered that the employment requirement on the site does not provide enough flexibility and that the inclusion of requiring a new community use to be unduly prescriptive |
| <p>NSP47 Elephant and Castle Shopping Centre and London College of Communication</p> <ul style="list-style-type: none"> • The Elephant Amenity Network consider that the required uses must include replacement affordable retail units for existing traders • TfL suggest clarifying the connectivity for pedestrians and cyclists in the site vision diagrams • Thames Water Utilities note that the water network capacity in this area may be unable to support the demand anticipated from this development. There are no waste water infrastructure concerns. |
| <p>NSP48 London Southbank University Quarter</p> <ul style="list-style-type: none"> • The Elephant Amenity Network suggest the site is not sound because the university is an asset and should continue as a place of learning • TfL suggest mentioning protecting and enhancing CS7 • Thames Water Utilities note that the water network capacity in this area may be unable to support the demand anticipated from this development. There are no waste water infrastructure concerns. |
| <p>NSP49 1-5 Westminster Bridge Road</p> <ul style="list-style-type: none"> • The Elephant Amenity Network suggest that the description of the site fails to mention or protect the existing uses on the site including voluntary services • Historic England regard this site as inappropriate for tall buildings • Lawford and Sons Ltd request the inclusion of 136-142 Old Kent Road as a site allocation • Thames Water do not envisage infrastructure concerns |

Herne Hill and North Dulwich Area Vision

No comments were received regarding the Area Vision.

NSP50: Bath Trading Estate

- The GLA has stated that it would be useful for the document to state the total of all industrial and employment land, including floorspace that is proposed for release and any additional provision.
- Historic England welcomes the identification of the Grade II* Half Moon public house on the accompanying map and states that this should also be referenced in the policy text at the end of the third paragraph.
- LB Lambeth has commented that the site sits on the borough boundary and that development should preserve or enhance the setting of Brockwell Park (a Registered Landscape and Conservation Area) and that this needs to be acknowledged in the text.
- Objections to the failure to define requirements for industrial accommodation within the site allocation and state that this affects the soundness of the NSP as a whole.
- Thames Water does not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.
- The Dulwich Estate is concerned about the requirement to provide a public route through the site towards Half Moon Lane.

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| London Bridge |
| London Bridge Area Vision |
| <ul style="list-style-type: none"> • GPE support the area vision and suggest that further consideration could be given to retail as a growth opportunity. They also suggest that the requirement to maintain the Shard as the tallest building is too prescriptive. They also propose an additional site to be included as a site allocation • Greystar Ltd is fully committed to investing in the London Bridge Area Vision • The extension to the boundary of the London Bridge District Town Centre is considered to be unjustified • PLA welcome the reference to the statement that developments should enhance the enhance the sense of place and visitor and cultural activities along the Thames riverfront as well as encourage use of river transport • Team London Bridge welcome the area vision and suggest that the Boulevard requires a more unifying approach than is evident in the three separate site allocations that run along St Thomas Street so it could be strengthened by combining the site allocations • There should be a height limit for tall buildings in this location • Theatres Trust welcome the recognition of the important role these areas have in terms of arts and cultural provision |
| NSP51 London Bridge Health Cluster |
| <ul style="list-style-type: none"> • Guys and St Thomas want to include C3 and student accommodation and office space on the site allocations. They also express concern on wording about tall buildings stepping down to site boundaries • Thames Water would require detailed proposals of the site to assess the impact on infrastructure <p>Legality of the plan</p> <ul style="list-style-type: none"> • The sites are unjustified because the views of the local residents have not been fully considered and taken into account |
| NSP52 Land between Melior Street, St Thomas Street, Weston Street and Fenning Street |
| <ul style="list-style-type: none"> • Members of the community do not feel that there is sufficient evidence to show that the local community has been engaged and participated in the process and are concerned about the effects of tall buildings on the character of the area. Concerns also raised over the methods used to calculate indicative site capacities • Greystar raise concerns about the sharpening of the word 'may' to 'should' provide residential • Team London Bridge believe delivery of the Boulevard requires a more unifying approach than is evident in the three separate site allocations that run along St Thomas Street. • Thames Water note that the water network capacity may be unable to support the demand from development on the site. There are no waste water infrastructure concerns. • Zurich Assurance Ltd welcome the site allocation but are concerned about the employment requirement |
| NSP 53 Land between St Thomas Street, Fenning Street, Melior Place, and Snowsfields |
| <ul style="list-style-type: none"> • Members of the community do not feel that there is sufficient evidence to show that the local community has been engaged and participated in the process and are concerned about the effects of tall buildings on the character and heritage of the area. It is suggested that height restrictions should apply • Concerns are raised that the site allocation and P14 are intended to facilitate high rise buildings on St Thomas St. There is no indication in the site brief that illustrates |

how a tall building could be incorporated into the site

- Concerns are raised over the preservation of Vinegar Yard warehouse and heritage assets on the site. The site brief should clearly set out the aim to preserve the warehouse
- Concerns also raised over the methods used to calculate indicative site capacities
- Team London Bridge believe delivery of the Boulevard requires a more unifying approach than is evident in the three separate site allocations that run along St Thomas Street
- Thames Water note that the water and wastewater water network capacity in this area may be unable to support the demand anticipated from this development. There are no waste water infrastructure concerns.
- Planning Resolution requests that the Horseshoe Pub is included in the site allocation

Legality of the plan

- The proposals for redevelopment of the sites are not justified because the views of the local residents have not been fully considered and taken into account.

NSP54 Colechurch House, London Bridge Walk

- Thames Water do not envisage infrastructure concerns relating to this site
- Proposals for the site are considered to be unjustified because the views of the local residents have not been fully considered and taken into account

Old Kent Road Site Allocations Amended Policies (Jan 2019) Consultation Response Summaries

NSP57 Mandela Way

- The Mayor of London welcomes the requirement for the re-provision of industrial uses capacity.
- Possfund Custodian Trustee Ltd objects to the LSIS designation and sufficient detail is provided in the draft Old Kent Road AAP.
- Trustees of the Tate Gallery does not object to the inclusion of industrial uses however operational requirements of them and sensitive residential uses located alongside must be accommodated without prejudice to industrial operations. The draft AAP guidance and the NSP site vision and site requirements should be aligned.
- Vital OKR support the LSIS designation but consider there should be a policy, more guidance should be given regarding the quantum and type of industrial accommodation, and object to map notations of improved connectivity on the site vision map. Also suggest part of the site boundary should be reduced to emit the area adjoining OKR.

NSP65 Land bounded by Glengall Road, Latona Road and Old Kent Road

- The Mayor of London supports the requirement for reprovision of industrial uses but considers the area between the retained SIL and Ossory Road should remain as SIL.
- The site allocation should acknowledge and contribute positively to Burgess Park MOL/SINC and the Glengall Road conservation area (Friends of Burgess Park).
- Support from Berkeley Homes.
- Vital OKR support the LSIS designation but consider there should be a policy, more guidance should be given regarding the quantum and type of industrial accommodation, and object to map notations of improved connectivity on the site vision map. Suggest further locations for LSIS and SPIL within the site allocation.

NSP69 and NSP70 Hatcham and Ilderton Road

- The Mayor of London objects to the loss of SIL in this location and that industrial uses should be retained and intensified. It would be difficult to accommodate mixed use development on some parts of the site.
- Support from Twenty Twenty Glengall Ltd with note that site-specific considerations should be taken into account as the site allocations are very large.
- Vital OKR support the LSIS designation but consider there should be a policy, more guidance should be given regarding the quantum and type of industrial accommodation, and object to map notations of improved connectivity on the site vision map. Suggest further locations for LSIS and SPIL within the site allocation.

SPIL Gasworks site boundary change

- Objections relate to the reduction of SPIL designation in this location.

Old Kent Road Area Vision and Site Allocations PSV Consultation Response Summaries

Old Kent Road Area Vision

- Some respondents consider the policy is unsound as it is not effective.
- Capital Industrial consider the new green space identified on the vision map should be marked as indicative as it may undermine the deliverability and viability of sites.
- The Vision should refer to a wider amount of historic buildings.
- The Surrey Canal Linear Park should do more than be a cycling corridor, by providing play space and places to relax.
- The town centre extent should be clearer, tall buildings should be defined.
- The ESFA support the inclusion of requirements for new or expanded schools in the Vision.
- Elephant Amenity Network consider the Vision unsound due to the OKR being distinctive and not part of the CAZ, it is dependent on the Bakerloo Line Extension, there is no provision of community engagement, the SIL should be maintained, there should be explicit acknowledgement of migrant and ethnic businesses, green infrastructure should be reinforced around industrial sites not through them, it should promote the growth of culture and art and include the OKR as a high street.
- The Mayor of London and TFL consider the phasing mechanism for the OKR based on the Bakerloo Line extension delivery should be included in the Vision. TFL require reference to the Healthy Streets Approach for OKR, cleaner buses, cycle hire and deliveries and servicing.
- Helix International Group and 313-349 Ilderton Road LP supports the Vision.
- Indigo Planning consider student accommodation should be specifically referenced in the Vision.
- General support regarding Old Kent Road development and the Bakerloo Line extension.
- All sites in the OKR should retain some industrial uses, provide social rented homes, replace retail for those who have been relocated, provide green space, include small business space and community facilities.
- The vision should include reference to integrated water management and liaison with Thames Water.

NSP55 Bricklayers Arms

- Some respondents consider the policy is unsound as it has not been justified, as the views of residents have not been taken into account.
- Concerns raised that tall buildings would block views along the Old Kent Road and overshadow a conservation area, school, senior's home and listed buildings.
- Concerns that no green space is provided and development would remove existing green space and trees.
- TFL consider proposals for reconfiguring Bricklayers Arms junction would need to be subject to a detailed assessment of the impacts and the policy should reference this, and existing uses need to be updated. The BLE team considered the feasibility of providing a Bakerloo Line station at Bricklayers Arms.
- Waste water infrastructure should be discussed with Thames Water.
- Removing the flyover would negatively impact on the taxi trade.

NSP56 Crimscott Street and Pages Walk

- Some respondents consider the policy is unsound as it has not been justified, as the views of residents have not been taken into account.
- Concerns that the design and accessibility guidance neglects to address improved connectivity for pedestrians and cyclists.
- Concerns regarding the loss of industrial land and where mixed use development is proposed, the site allocation should include the type and quantum of industrial

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| <p>floorspace (Vital OKR).</p> <ul style="list-style-type: none"> No waste water infrastructure concerns (Thames Water). |
| <p>NSP57 Mandela Way</p> <ul style="list-style-type: none"> Some respondents consider the policy is unsound as it has not been justified, as the views of residents have not been taken into account. Concerns regarding the loss of industrial land and where mixed use development is proposed, the site allocation should include the type and quantum of industrial floorspace (Vital OKR/Elephant Amenity Network). TFL consider the existing bus garage may need to be maintained subject to need. Waste water infrastructure should be discussed with Thames Water. Amendments to required uses suggested by John Lyon's Charity including on site servicing and a range of employment spaces. |
| <p>NSP58 107 Dunton Road (Tesco store and car park) and Southernwood Retail Park</p> <ul style="list-style-type: none"> Some respondents consider the policy is unsound as it has not been justified, as the views of residents have not been taken into account. Greenpruce GP support the site allocation in principle however should be noted that extensive public benefits should be balanced with the delivery of the tube station and transport infrastructure and acknowledged there is more than one landowner which should be factored into delivery of community infrastructure. TFL consider the approach to car parking should be reviewed on the basis of a potential new tube station and the bus stand in Humphrey Street should be protected. No waste water infrastructure concerns (Thames Water). |
| <p>NSP59 Salisbury Estate Car Park</p> <ul style="list-style-type: none"> Some respondents consider the policy is unsound as it has not been justified, as the views of residents have not been taken into account. No waste water infrastructure concerns (Thames Water). |
| <p>NSP60 Old Kent Road (Lidl Store)</p> <ul style="list-style-type: none"> Some respondents consider the policy is unsound as it has not been justified, as the views of residents have not been taken into account. No waste water infrastructure concerns (Thames Water). |
| <p>NSP61 Former petrol filling station, 233-247 Old Kent Road</p> <ul style="list-style-type: none"> Some respondents consider the policy is unsound as it has not been justified, as the views of residents have not been taken into account. No waste water infrastructure concerns (Thames Water). |
| <p>NSP62 Kinglake Street Garages</p> <ul style="list-style-type: none"> Some respondents consider the policy is unsound as it has not been justified, as the views of residents have not been taken into account. No waste water infrastructure concerns (Thames Water). |
| <p>NSP63 4/12 Albany Road</p> <ul style="list-style-type: none"> Some respondents consider the policy is unsound as it has not been justified, as the views of residents have not been taken into account. The Thomas a Becket pub and listed Fire Station should be referred as historical assets in the site guidance for this policy. |
| <p>NSP64 Former Southern Railway Stables</p> <ul style="list-style-type: none"> Some respondents consider the policy is unsound as it has not been justified, as the views of residents have not been taken into account. Concerns regarding the loss of industrial land and where mixed use development is proposed, the site allocation should include the type and quantum of industrial floorspace (Vital OKR/Elephant Amenity Network). The existing amount of employment space should be retained (Peckham Society). The former Southern Railway stables, open space and cobbled pavements should be |

protected as valuable heritage assets.

NSP65 Land bounded by Glengall Road, Latona Road and Old Kent Road

- Some respondents consider the policy is unsound as it has not been justified and is not effective, and the views of residents have not been taken into account.
- Support from Berkeley Homes.
- Support from Twenty Twenty Glengall Ltd regarding the SIL boundary revision.
- Design guidance should refer to existing estates, respecting local character and building heights, industrial heritage buildings, views from conservation areas.
- The Mayor of London considers the area between the retained SIL and Ossory Road should remain as SIL.
- Concerns regarding the loss of industrial land and where mixed use development is proposed, the site allocation should include the type and quantum of industrial floorspace (Vital OKR).
- Cumulative effects of tall buildings should be considered particularly with regard to impacts on existing character, heritage and townscape.
- National Grid prefer that development is not directly above underground cables in this vicinity and that access for maintenance is maintained. Also overhead lines should be taken into account.
- Peckham Society considers the existing level of retail should be retained.
- Waste water infrastructure should be discussed with Thames Water.

NSP66 Marlborough Grove and St James's Road

- Some respondents consider the policy is unsound as it has not been justified, as the views of residents have not been taken into account.
- Concerns regarding the loss of industrial land and where mixed use development is proposed, the site allocation should include the type and quantum of industrial floorspace (Vital OKR).
- Cumulative effects of tall buildings should be considered particularly with regard to impacts on existing character, heritage and townscape.
- Support by Helix International Group Ltd however clarity on the type of mixed use development should be provided.
- Support by Royal London regarding Six Bridges Estate – the ambitious mixed use industrial may be challenging and will require innovation, support removal of SIL designation.
- Indigo Planning consider student accommodation should be mentioned specifically in the site vision.
- Waste water infrastructure should be discussed with Thames Water.

NSP67 Sandgate Street and Verney Road

- Some respondents consider the policy is unsound as it has not been justified, as the views of residents, including Canal Grove cottages, have not been taken into account.
- GL Hearn (on behalf of Avanton) require clarification on the strategic coordination of SIL consolidation in the OKR opportunity area in relation to this site allocation.
- Concerns regarding the loss of industrial land and where mixed use development is proposed, the site allocation should include the type and quantum of industrial floorspace (Vital OKR/Elephant Amenity Network).
- Cumulative effects of tall buildings should be considered particularly with regard to impacts on Canal Grove.
- Support from L&G.
- National Grid prefer that development is not directly above underground cables in this vicinity and that access for maintenance is maintained. Also overhead lines should be taken into account.

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| <ul style="list-style-type: none"> Waste water infrastructure should be discussed with Thames Water. |
| <p>NSP68: Devon Street and Sylvan Grove</p> <ul style="list-style-type: none"> Some respondents consider the policy is unsound as it has not been justified, as the views of residents have not been taken into account. Design requirements should have more detail on heritage, existing low rise listed housing and the impact of tall buildings, play space on the linear park and the listed gasholder. Concerns regarding the loss of industrial land and where mixed use development is proposed, the site allocation should include the type and quantum of industrial floorspace (Vital OKR/Elephant Amenity Network). Safestore would seek to continue their existing operation on this site. Waste water infrastructure should be discussed with Thames Water. Scotia Gas Networks consider surplus utilities sites should be considered for release in SIL. The current Hazardous Substance Consent can be revoked once SGN are certain there are no longer operational requirements for the gasholder site. |
| <p>NSP69 and NSP70 Hatcham and Ilderton Road</p> <ul style="list-style-type: none"> Some respondents consider the policy is unsound as it has not been justified, as the views of residents have not been taken into account. Support from Aitch Group with request that no further amendments to the SIL boundary are made. Capital Industrial consider properties on the western side of Ormside Street should be de-designated from SIL and included in the site allocation. The Mayor of London objects to the loss of SIL in this location and that industrial uses should be retained. It would be difficult to accommodate mixed use development on some parts of Ilderton Road on land which sits between the road and railway line. Concerns regarding the loss of industrial land and where mixed use development is proposed, the site allocation should include the type and quantum of industrial floorspace (Vital OKR/Elephant Amenity Network). National Grid prefer that development is not directly above underground cables in this vicinity and that access for maintenance is maintained. Also overhead lines should be taken into account. Waste water infrastructure should be discussed with Thames Water. Support from Twenty Twenty Glengall Ltd with note that site-specific considerations should be taken into account as the site allocations are very large. Support from 313-349 Ilderton Road LLP. |
| <p>NSP71 760 and 812 Old Kent Road (Toyrus store)</p> <ul style="list-style-type: none"> Some respondents consider the policy is unsound as it has not been justified, as the views of residents have not been taken into account. Concerns regarding the loss of industrial land and where mixed use development is proposed, the site allocation should include the type and quantum of industrial floorspace (Vital OKR/Elephant Amenity Network). Waste water infrastructure should be discussed with Thames Water. |
| <p>NSP72 840 Old Kent Road (Aldi store)</p> <ul style="list-style-type: none"> Some respondents consider the policy is unsound as it has not been justified, as the views of residents have not been taken into account. Waste water infrastructure should be discussed with Thames Water. |
| <p>NSP73 684-698 Old Kent Road (Kwikfit garage)</p> <ul style="list-style-type: none"> Some respondents consider the policy is unsound as it has not been justified, as the views of residents have not been taken into account. Concerns regarding the loss of industrial land and where mixed use development is proposed, the site allocation should include the type and quantum of industrial floorspace (Vital OKR/Elephant Amenity Network). |

- Waste water infrastructure should be discussed with Thames Water.

NSP74 636 Old Kent Road

- Some respondents consider the policy is unsound as it has not been justified, as the views of residents have not been taken into account.
- Concerns regarding the loss of industrial land and where mixed use development is proposed, the site allocation should include the type and quantum of industrial floorspace (Vital OKR/Elephant Amenity Network).
- No waste water infrastructure concerns (Thames Water).

Peckham Area Vision and Site Allocations PSV Consultation Response Summaries

Peckham Area Vision

- Some respondents consider the policy is unsound as it has not been positively prepared, effective, justified or consistent with the NPPF.
- Concerns that specific locations for tall buildings are not identified in the area visions, concerns about tall buildings and protecting the heritage of Peckham.
- Concerns that there is a net loss of industrial land.
- Concerns that the Area Vision does not take into account views of residents throughout the consultation process.
- Concerns there are inconsistencies between the PNAAP and the NSP.
- Concerns that the need for improvements to specific cycleways, cycle hire and walking routes have not been addressed in the vision.
- Support for identification of the Peckham Coal Line and suggestion that further information should be added about the project and its aims.

NSP75 Aylesham Centre and Peckham Bus Garage

- Some respondents consider the policy is unsound as it has not been positively prepared, effective, justified or consistent with the NPPF.
- There are objections to tall buildings on this site and the effect on local views from the Bussey Building, including a local petition, there are concerns that the impact of tall buildings and the policy does not state the level of harm or benefit to the community, and the principle of tall buildings in the Peckham and Nunhead AAP is outdated.
- There are concerns that the views of local residents have not been fully considered and taken into account.
- The site should include community social spaces and public open space.
- The boundary is shared with historic buildings and conservation areas which should have special attention.
- There are concerns about the loss of town centre car parking by residents, however a substantial reduction in car parking is expected by the GLA.
- The inclusion of a Community Land Trust in the policy is welcomed and maximising the amount of affordable housing on the site.
- The bus station is likely needed to be re-provided and could be co-located with new homes (TFL).
- Thames Water note that the water network capacity in this area may be unable to support the demand anticipated from this development. There are no waste water infrastructure concerns.
- Tiger Developments object to safeguarding a private view from the Bussey Building, also state the building height section should be changed from 20m to 20 storeys, and should cross reference borough view 1 (One Tree Hill).

NSP76 Blackpool Road Business Park

- Some respondents consider the policy is unsound as it has not been justified, particularly regarding consultation with stakeholders and alternatives for development.
- Concerns raised regarding loss of local businesses including Buildbase.
- Further protection sought for the industrial heritage buildings including the Victorian Mill House building (containing church and community centre).
- Concerns over the impact on the council's depot, the bus garage, loss of industrial uses and tall buildings.
- Some support for redevelopment to include residential and commercial development, improvements to air quality and ensuring daylight to existing residential properties is maintained.
- Grafton Group suggests an update to description of the existing uses and seeks

provision of design guidance on pedestrian routes, suitable land uses and building heights.

- Local residents consider there are a lack of community facilities in the area and the site redevelopment should provide open space and food growing.
- TFL consider the bus garage may need to be retained and could be co-located with new homes.
- The policy should mention the Peckham Coal Line.

NSP77 Land between the railway arches (East of Rye Lane including railway arches)

- Some respondents consider the policy is unsound as it has not been justified and positively prepared, as the views of residents have not been taken into account.
- Concerns regarding the loss of industrial land and that a minimum quantum of industrial accommodation should be provided in the policy (Vital OKR).
- The north-south arrow should be removed because it shows it going through the Peckham Multi-storey building which was previously removed from the NSP.
- The policy should mention the Peckham Coal Line.
- The C&A heritage building and the historic and cultural asset the Bussey Building should be protected.
- No waste water infrastructure concerns (Thames Water).

NSP78 Copeland Industrial Park and 1-27 Bournemouth Road

- Some respondents consider the policy is unsound as it has not been justified and the views of residents have not been taken into account.
- Montagu Evans on behalf of the freeholder of the site suggest deletion of the site allocation as it duplicates the allocation in the PNAAP. The difference being that residential uses should not be located on Bournemouth Road and this sentence should be removed.
- Some respondents also raise concerns regarding the compatibility of town centre uses and housing as well as the location of tall buildings.
- Reference to a possible cinema should be removed as this has been overtaken by other developments including PeckhamPlex and the Bussey Building.
- The site should support smaller businesses rather than large scale retail outlets.
- The policy should mention the Peckham Coal Line.
- Waste water infrastructure should be discussed with Thames Water.

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| Rotherhithe Proposed Submission Version |
| Rotherhithe Area Vision |
| <ul style="list-style-type: none"> • ESFA support the inclusion of requirements for new or expanded schools • Objection to area vision on failure to protect the existing boatyard • PLA consider that reference must also be given to the use of the River Thames as an alternative form of transportation in regards to any future development near to the riverside in this location • TfL suggests the need for development to support the expansion of cycle hire should be included • Resident suggests that the 2005 masterplan should be implemented rather than the current CWAAP making particular reference to the Leisure Centre • The integrity of consultations should be upheld and consultations should be well advertised |
| <p>Legality of plan</p> <ul style="list-style-type: none"> • Not considered to be consistent with national policy and local plan • The plan has not consulted residents or fully considered the community's views |
| NSP79 Rotherhithe Gasometer |
| <ul style="list-style-type: none"> • Objection to the failure to define any requirement for industrial accommodation within mixed-development • SGN support the site allocation • Thames Water note that the water network capacity in this area may be unable to support the demand anticipated from this development |
| NSP80 St Olav's Business Park |
| <ul style="list-style-type: none"> • Several individuals fully support the NSP and changes to the policy are welcomed |
| NSP81 Decathlon Site and Mulberry Business Park |
| <ul style="list-style-type: none"> • Objection to the failure to define any requirement for industrial accommodation within mixed-development • Thames Water note that the water network capacity in this area may be unable to support the demand anticipated from this development |
| NSP82 Harmsworth Quays, Surrey Quays Leisure Park, Surrey Quays Shopping Centre and Robert's Close |
| <ul style="list-style-type: none"> • Objection to the failure to define any requirement for industrial accommodation within mixed-development • Thames Water note that the water network capacity in this area may be unable to support the demand anticipated from this development • Policy is considered to be inconsistent with national policy and the London Plan |

Walworth Proposed Submission Version

| Walworth Proposed Submission Version |
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| Area Vision |
| <ul style="list-style-type: none">• Area vision is considered to be unsound because it does not mention the Walworth Neighbourhood Plan and there is no recognition of the wide variety of communities from different ethnic and cultural backgrounds who have made Walworth their home. Nor is there a mention of retaining independent shops.• Friends of Nursery Row Park and Friends of Palsey Park strongly support the policy and suggest Victory Community Park, Faraday Gardens and Salisbury Row Park be added• TfL suggest the need for development to support cycle hire expansion should be included• It is requested that 262 and 262a Walworth Road is included as a site allocation |
| NSP83 Morrison's Walworth Road |
| <ul style="list-style-type: none">• TH Real Estate supports the site allocation but suggests restricting the use of the site for the retention of the supermarket and new homes only is too prescriptive. It is also suggested that an alternative walking route through the site would be more acceptable• Thames Water note that the water network capacity in this area may be unable to support the demand anticipated from this development• The removal of indicative capacities is supported and suggests that a like for like replacement of uses may not always be appropriate and that greater flexibility is applied to the range of uses allowed on the site |
| NSP84 330-334 Walworth Road |
| <ul style="list-style-type: none">• One representation wants this site deleted as it is a much loved Turkish store• Thames Water do not envisage any infrastructure concerns |
| NSP85 Chatelain House, 182-202 Walworth Road |
| <ul style="list-style-type: none">• Thames Water do not envisage any infrastructure concerns |