

Representation	Officer Response
<p>SP2: Regeneration that works for all</p>	
<p>Organisation: Southwark Charities NSPPSV334</p> <p>We write in regard to the above current planning policy consultation on the emerging New Southwark Local Plan (“the Plan”) on behalf of Southwark Charities (“our Client”). Our Client is a long established charitable organisation within Southwark with the oldest component of the charity being founded in 1603 with over 400 years of charitable activity within the borough.</p> <p>Our Client has two significant freeholds within Southwark with these being Edward Edwards' House, Blackfriars and St Mary Newington Close, Walworth. Both of these sites provide essential residential accommodation in the borough for older people in the form of almshouses, with this accommodation offering older persons in need the opportunity to lead independent lives in a safe, secure and supported environment.</p> <p>The following comments are therefore submitted in the context of ensuring that the Plan allows for our Client to maintain and enhance this highly valuable specialist accommodation for older people within the borough. Current Public Consultation (Amended Policies January 2019)</p> <p>In regard to the current consultation we confirm our support that the Plan is legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012. Similarly and in accordance with Paragraph 35 of the National Planning Policy Framework (2018), it is considered that the Plan is in principle ‘sound’ in the context of being justified, effective, consistent with national policy and the London Plan, and positively prepared.</p> <p>We do however make the following minor recommendations to the updated Plan to ensure full compliance.</p>	<p>Support noted.</p>

We write to confirm our full support for this policy and in particular part (2) investing in communities and existing residents and Part (6) in driving good design that installs pride of place in all communities.

It is considered that older people play an important role in delivering mixed and integrated communities and the policy approach in supporting the focus of regeneration for existing residents should be fully supported.

Organisation: Camberwell and Metropolitan  
NSPPSV365

On the basis of the foregoing and the representations of others to which I am privy, I am not entirely convinced that the proposed New Southwark Plan in its current format is ready for independent examination and that the Council can submit the document whilst complying with its statutory obligations under Section 20(2)(b) of the Planning and Compulsory Purchase Act 2004.

Camberwell & Metropolitan, the Camberwell Society and our collaborators all have substantive recommendations to make to remedy the substantive defects with the proposed submission. Many of these have been developed from scratch over the past few months and refined over the past days. It is impossible to even offer a precis at the eleventh hour before the consultation closes. A detailed letter will follow this one in due course.

In the meanwhile, please note that I wish to exercise my right under Section 20(6) of the Act to appear and be heard during the Examination in Public of the proposed submission of the New Southwark Plan.

I write foremost as a director of this firm but also as a member of the Camberwell Society's planning sub-committee.

Whilst I must laud the ambition of the Council's aims in the New Southwark Plan, I do still harbour many of the concerns expressed during previous consultations and I share the concerns expressed by other groups and individuals in respect of this consultation on the Amended Policies 2019. In these representations, I would like to highlight two concerns that arise from

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

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

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

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

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

the stated aims of amended Policy SP2: Regeneration that works for all, namely:

- ‘heritage-led regeneration’; and
- ‘place plans for the different areas in the borough’.

By virtue of being a strategic policy, these concerns affect not just Policy SP2 but also new Policy P70: Local List which is itself disconcertingly unsound at present. Heritage-led regeneration’

Part 6 of the amended policy states that the revitalisation of Southwark’s places and neighbourhoods will be achieved through ‘enhancing...heritage-led regeneration’. What is troubling is not just the delivery of this aim, but also the unintended consequences of its likely misinterpretation interpreted and arbitrary application.

Policies.

Individual  
NSPPSV351

I would like the opportunity to speak at the Examination in Public –

SP2: Regeneration that works for all

I do not consider the policy to be sound or justified because of poor evidence, lack of community consultation, and fundamental undeliverability, both in itself and in relation to other parts of the NSP - including the policies on Tall Buildings (P14) and Local List (P70.)

For SP2 points 5 (on collaboration) or point 6 (on heritage) to be sound they would need to be developed through genuine community consultation, which has not happened. Community input and/or a genuine review opportunity is needed.

The current high rise development plans for St Thomas' Street are against all local opinion, and are in complete contrast to the neighbouring environment, including a Conservation Area, which is characterised by warehouse

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

P14 is considered compliant with the Mayor’s adopted London Plan (2016) and the emerging draft New London Plan, as the workings of our plan-led approach is set out in the emerging Tall buildings background and research paper with an urban context evaluation section mapping out constraints within the Borough. Further to this specific site allocations have been

developments and a small business community. There is a danger of losing the distinct qualities that make the area attractive to both residents and visitors. Furthermore, the knock on effects on parking, congestion, and environmental impact do not seem to have been addressed.

identified to anticipate tall building development within the guidance section to ensure that there is a clear plan-led approach to constructing tall buildings. The background and research paper also discusses how 'appropriate, sensitive and in appropriate locations' have been identified. The detail of heights however shall not be covered in the NSP as it is a strategic policy document, but rather in the AAP or SPD associated to the area vision of the site allocation.

Individual  
NSPPSV419

I live at X. I would like the opportunity to speak at the Examination in Public SP2: Regeneration that works for all.

While it sounds positive, this policy is not justified or effective because of poor evidence, lack of community consultation and fundamental undeliverability, both in itself and in relation to other parts of the NSP - including the policies on Tall Buildings (P14) and Local List (P70) for example.

For SP2 points 5 (on collaboration) or point 6 (on heritage) to be sound they would need to be developed to be less vague through genuine community consultation with examples of potential positive tools for practical implementation explored and then given mention - like community led design review panels for example.

Direct links should also then be made to policies like P14 and P70 - the evidence bases for which need considerable work themselves.

Current planning activity on St Thomas Street - where major high-rise planning applications are being granted directly against local opinion and ahead of the promised 'charters / place plans' - is an example of how much work needs to be done before the local plan is sound. If this does not happen, the unique historic qualities of this local environment will very soon be irretrievably lost

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<p>and with them the distinct sense of place they afford.</p>	<p>strategic policy document, but rather in the AAP or SPD associated to the area vision of the site allocation.</p>
<p>Individual NSPPSV333</p> <p>No further comment applied.</p>	<p>Comment noted.</p>
<p>Individual NSPPSV336</p> <p>Please see comment on Policy P9 which relates to Policy SP2(3).</p>	<p>Comment noted.</p>
<p>Individual NSPPSV338</p> <p>Because too many tall buildings could be built, it is not showing proper massing levels in any of the development sites. there is a real risk that tall buildings will severely impact the light in burgess park and other housing in the area, particularly Camberwell Centre and SE5 Area. throwing much into shadow. This will have a significantly detrimental affect on mental wellbeing and living and recreational conditions will be adversely affected. There is no suitable transport to support the potential developments with Buses proposed to be reduced by TFL, and overcrowding at Denmark hill and the trains that stop there are too crowded to take on the commuters. There should be a statement as to the maximum floors acceptable in development sites, which should be no</p>	<p>Representation noted. Tall building development will be assessed against all policies in the NSP, including policy P54: Protection of amenity which provides guidance on how to mitigate impacts related to daylight and sunlight. It should be acknowledged that the NSP and its policies must be read as a whole. Site allocations that have been designated to anticipate tall buildings have been strategically assessed through our Sites Methodology Paper. This methodology paper underpins the site vision section to all site allocations which then provides further guidance on the expectations for the site in regards to how development can integrate with the existing context.</p>

<p>more than 10 storeys. There should be less development if there is no transport link increases.</p>	<p>In addition to this site locations are being updated to clearly set out the sensitive constraints that each developer should pay regard to when developing the site. These sensitivities are reflective of factors that have been evaluated in the tall buildings background and research paper ensuring tall building development is correctly implemented.</p>
<p>Individual NSPPSV340</p> <p>No further comment applied.</p>	<p>Comment noted.</p>
<p>Individual NSPPSV341</p> <p>Regeneration doesn't work for residents on the Housing Waiting List</p> <p>The planning approval for the regeneration of the Aylesbury Estate, 14/AP/3844, is predicated on the loss of 778 homes for social rent and it is predicated on the loss of 237 affordable homes.</p> <p>The proposed Strategic Policy SP2 states:</p> <p>“We will continue to revitalise our places and neighbourhoods to create new opportunities for residents,..”; and “2. Investing in our communities and residents, and particularly existing residents, so that everyone can access the benefits of our regeneration programmes and the opportunities created by those programmes for new homes, new jobs, education, training and new infrastructure.”</p> <p>Strategic Policy SP2 presents no explanation as to how the loss of 778 homes for social rent or 237 affordable homes in the Aylesbury regeneration, for example, can benefit ‘particularly existing residents’ on Southwark Council’s</p>	<p>The temporary loss of housing is with the intention of providing a long-term increased capacity of housing stock, including affordable and socially-rented. Where the council has demolished affordable housing, where viable, we will seek to replace this like-for-like or else increase the level of affordable housing. In a number of instances, estate regeneration has been required due to the quality of the existing housing stock which is not considered fit for purpose.</p> <p>The Council Plan 2018/19-2021/22 sets commitments for the borough. This includes introducing ballots on any new estate regeneration and a Consultation Charter to ensure local residents can hold private sector developers to account. The ballot system has been introduced for new estate regeneration as has a draft Developer’s Charter which ensures developers clearly set out how they have addressed residents’ and stakeholders’ concerns. The Developer’s Charter forms part of our updated Statement of Community Involvement, which will clearly inform residents on how we plan to consult and how they can get involved in directing planning.</p>

### Housing Waiting List.

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

Clearly Regeneration that works for all will need to stop the haemorrhaging of social housing in Southwark if Regeneration that works for all is to work for the many thousands of Southwark residents currently on its Housing Waiting List. In each of the most recent 4 weeks of bidding cycles (to Sunday 12 May 2019) for one- bedroom flats there were a grand total of 1, 1, 2 and 2 flats, respectively, available for residents bidding! In consequence there were more than 500 residents bidding for just one flat. Strategic Policy SP2: Regeneration that works for all presents no explanation as to how these chronic circumstances will be or can be turned around.

Strategic Policy SP2: Regeneration that works for all is therefore Unsound as it has not been positively prepared, it is not justified, and it is not effective.

1719 homes for social rent being lost in two schemes.

941 homes for social rent have already been lost in the Heygate regeneration, and 778 homes for social rent are currently being lost in the Aylesbury regeneration. So a total of 1719 homes for social rent are being lost in Southwark with just these two regeneration schemes. That means just these two regeneration schemes are resulting in 1719 fewer homes available for the thousands of people on Southwark Council's Housing Waiting List. As Lady Bracknell didn't say regarding the Heygate and Aylesbury:

"To lose one huge estate of social housing, Southwark Council, might be regarded as a misfortune; to lose both looks like carelessness!"

Aylesbury Leaseholders are subject to Compulsory Purchase Orders on their homes. Implementation Policy IP4: Compulsory purchase order (CPO) states that "Compulsory Purchase Orders (CPOs) are legal tools available for planning authorities to use to compulsorily purchase land which is owned by a non-co-

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operating party. Implementing CPOs is a long process that is used as a last resort when all other options, including negotiation, have been exhausted.” It is noticeable that the Implementation Policy refers to ‘land’, but makes no mention of compulsorily purchasing people’s homes. It also mentions “a last resort when all other options.. have been exhausted.”

We know this to be factually wrong in the numerous cases on the Aylesbury Estate: not one of the Leaseholders on the Aylesbury Estate was offered - or is currently being offered - a like-for-like replacement of their home, on the same ownership terms, in the same area.

This option is one which many people would consider to be the most moral option - indeed, maybe the only moral option - when Southwark Council is forcibly evicting people from their own homes – which they own – against their will.

The Public statement from the Aylesbury Leaseholders Action Group, right, following the Compulsory Purchase Order ruling on 14 November 2018 includes the following: “we have always said that the regeneration of our estate should not mean that the council can take our homes and leave us in a worse situation than before. The estate should either be refurbished for its current residents, or we should be offered a like- for-like replacement home: NOT a shared ownership that will put us back into debt, NOT a shared equity with less rights, NOT a flat outside of London away from our families, jobs, communities and networks. None of these options are acceptable for us.

We have lived and contributed to this community for years and decades: with a lot of effort and work we have bought our flats. Many of us will never be able to get another mortgage: Many of us are on low incomes, many of us are getting on, many are from migrant backgrounds and have struggled hard to make a life in this country for us and our kids. We do not deserve to pay the price of this regeneration!” Leaseholders on the Aylesbury Estate must be offered a like-for-like replacement of their home, on the same ownership terms, in the same area. This is the most moral option - indeed, the only moral option - when Southwark Council is forcibly evicting people from their own

<p>homes</p> <p>Strategic Policy SP2: Regeneration that works for all must include all the Leaseholders being evicted from their own homes throughout the regeneration processes, and explain how the regeneration will work for them. But the Leaseholders don't even merit a mention in the proposed Policy! Strategic Policy SP2: Regeneration that works for all is therefore Unsound as it has not been positively prepared, it is not justified and it is not effective.</p>	
<p>Individual NSPPSV182</p> <p>The amended policy appears to require publicly accessible space to be provided on or near to the top of all buildings that are higher than 30m (3.2); however, the wording of the policy is ambiguous. This is not reasonable or practical for buildings that are potentially as low as ten storeys. Irrespective of height, this also has management and security implications which would be unacceptable in TfL housing projects. For security reasons, TfL would also be unlikely to sanction public access to any office building that it develops for its own use.</p>	<p>Policy P14 has been re-worded from the previous policy requirements of point 3 to not be only applicable to developments above 30m and 60m, but a standard for all tall building developments.</p> <p>P14 is considered compliant with the Mayor's adopted London Plan (2016) and the emerging draft New London Plan, as the workings of our plan-led approach is set out in the emerging Tall buildings background and research paper with an urban context evaluation section mapping out constraints within the Borough. Further to this specific site allocations have been identified to anticipate tall building development within the guidance section to ensure that there is a clear plan-led approach to constructing tall buildings. The background and research paper also discusses how 'appropriate, sensitive and in appropriate locations' have been identified. The detail of heights however shall not be covered in the NSP as it is a strategic policy document, but rather in the AAP or SPD associated to the area vision of the site allocation.</p>
<p>Individual NSPPSV32</p>	<p>Social regeneration charters are currently in the process of being</p>

I understand an agreement between Southwark Council and Southwark Law Centre has permitted respondents to submit papers via email – hence my format).

(Draft 1)

Amendments version of the New Southwark Plan

It is my contention that the plan as amended is neither legal nor sound. One major reason for this is 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. In fact many of these so-called proposal sites have already been given full planning permission, including some extremely large sites. In some cases, work has started on site and the Inspector has not yet conducted his examination of the plan.

(If I am called to speak at the examination, I will have compiled and submitted a full list of the relevant sites).

I would like to appear at the public examination of this version.

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

It should be acknowledged that the NSP and its policies must be read as a whole. Site allocations that have been designated to anticipate tall buildings have been strategically assessed through our Sites Methodology Paper. This methodology paper underpins the site vision section to all site allocations which then provides further guidance on the expectations for the site in regards to how development can integrate with the existing context.

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

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

given full planning permission, including some extremely large sites. In some cases, work has started on site and the Inspector has not yet conducted his examination of the plan.

(If I am called to speak at the examination, I will have compiled and submitted a full list of the relevant sites).

Though I welcome the amendment acknowledging that all residents should benefit from regeneration, I query the soundness of the amendment given that most of the policies in the Submission Version of the plan should also have been re-written to take full account of the implications of the amendment. That has not happened and hence many groups and individuals affected by the Plan are not benefitting at all from regeneration in complete contravention of the Amendment.

For example, there are acknowledged deficiencies in council open space and also biodiversity sites in most 'regeneration areas'. This relates to Policies P56, P58 and P 59. (See also the council's 'Open Spaces Strategy' where nearly all the areas deficient in Public Open Space – some very seriously deficient, are also now regeneration areas under the Amended Plan). Surely the council, through its plan should have taken the opportunity to right this imbalance – if this latest amendment is to have meaning?

A further instance of un-soundness regarding these same policies on provision of open space and biodiversity is for example that Site Allocations for these same areas deficient in POS when referred to in the Submission Version often mention a duty on developers to 'provide open space ...' of a certain percentage of site area. ( e.g., Borough Bankside site allocations, p 97 Submission version). This is misleading and therefore unsound as designed, landscaped amenity land is meant to provide a setting for residents of the new build or customers of new retail/office areas and cannot ever be included in the council's total public open space portfolio and hence cannot be held to make up for current open space deficiencies endured by long term residents

living in these areas. Further it is not made clear when the site allocations refer to the council's desire to achieve extra open space that the rest of the site proposals will also result in an increase in population for that same area. Hence existing residents in regeneration areas will remain deficient in open space sites compared to the borough norm.

(If I am called to appear at the examination, I will have complied and submitted a full list of such Site Allocations).

(Further comments are to follow)

Individual  
NSPPSV40

do not consider this policy to be sound for the following reasons:

- Whilst the aspiration to have "Regeneration that works for all" is welcomed and an improvement from the previous heading, there is no evidence to show how this new amended policy will be achieved, or will make the policy sound.
- For example, I live on Lynton Road on the northern perimeter boundary of the Old Kent Road redevelopment area, within the Thorburn Square Conservation Area. The house faces south towards the Old Kent Road and whilst not in the immediate adjacent streets, it will be subject to massive impacts from the various planned developments.
- Whilst I understand there has been preparation and planning of development sites in and around the Old Kent Road going on for many years, in certain circles, it is only now within the last two months, that local residents in my neighbourhood have received notification of activities happening in relation to these Old Kent Road redevelopments.
- There has been no open public discussion with local people in the area, about the massive redevelopment schemes and even now many are unaware of the huge impacts these schemes will have in the area.
- Within our local neighbourhood there will be devastating visual, employment

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

and cultural impacts, the cumulative effects of which have not even begun to be discussed.

- There have been no open public conversations regarding the numerous and colossal redevelopment sites, nor have there been any set within the greater context of the OKR Master Plans, without which it is impossible to make substantive, informed, long term, sustainable decisions that 'work for all'.
- It is wholly unacceptable that occasional meetings led by Council officers and consultants, where the local resident public are simply told of decisions already made, are thought to be sufficient in terms of local collaborative, public consultation and engagement.
- There are fundamental and serious 'conflict of interest' issues in Southwark Council using Housing Associations and other 'developer landlords' to deliver housing and some other forms of social infrastructure in redevelopment and regeneration schemes, such as the Old Kent Road, where they are acting as both developer and landlord. It defies logic that such a thing is able to happen.
- The 'conflict of interest' issues arising from Southwark Council using developer landlords, such as Housing Associations, to deliver housing stock and some other forms of social infrastructure in redevelopment and regeneration schemes, where those developer landlords have tenants, whether resident or otherwise, who are impacted by the same schemes, makes this policy unsound, because a developer landlord is compromised and cannot be impartial and mindful of protecting the interests of its tenants, whether residents, shop keepers, businesses or street traders, when hired by the council and profiting from delivering such schemes. The existence and allowance of such an activity is a clear breach of the SP2 "Regeneration that works for all" policy, thus making it unsound.

2. Development Management policies (p.10).

Amended Policy

P14: Tall buildings (p.22)

I do not consider this policy to be sound for the following reason:

- This tall buildings policy as amended does not meet the housing need.

methodology paper underpins the site vision section to all site allocations which then provides further guidance on the expectations for the site in regards to how development can integrate with the existing context.

The idea that 'SP2 Regeneration that works for all' is not true. Already the maxing out of land values in the area has seen many people I have worked with or been neighbours with forced out. The rehearsal studios opposite mine in Bermondsey street - gone. As a film composer who has lived and worked in the area for over 17 years this was a useful asset. No longer. The increase in footfall in an already overcrowded area - try getting on the tube in the morning at London Bridge where there is constant overcrowding - will also have a long term negative effect on the area - rents for retail outlets will be increased leading to them generally being taken over by the only companies that can afford them - chains. The area has a very fine tradition of local independent shops which is one of the key reasons it has become a jewel in Southwark's crown. I see no provision for protecting this status. Regeneration can be good, but taken too far it leads ultimately to blandification. The idea that it is ALWAYS good is a lie. The Bermondsey street area is already incredibly regenerated and this is the crux of the problem with this plan. It wants to keep pushing - more and more people, more and more buildings, more more more, until there's nothing left. It does not listen to the wishes of the local community.

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

The Council has recognised the concern that regeneration may have on local businesses and availability of affordable workspaces to support local entrepreneurs and creative professionals. In order to protect these businesses, the Council has provided two new policies: Affordable workspace (P30) and Small Shops (P31). The offices and industrial background paper provide indication of the potential impact of implementing these policies. The Affordable Workspace in Southwark – Evidence of needs (2019) evidence-base also identifies how the Council's policies are sound and supportive of our businesses and local communities.

Individual  
NSPPSV50

This only seems to apply to areas with charters therefore it is not regeneration that works for all. Communities are not consulted appropriately therefore it cannot work for all. Communities are squeezed out of, not included in, new developments. Without a change from a market led development model, which favours housing unaffordable to those who need homes, all residents cannot benefit from regeneration. For example, the loss of 778 council rented homes and 237 affordable homes on the Aylesbury estate is not benefitting those residents. To benefit all regeneration should consider need over profit e.g. develop in response to need evidenced by Southwark's council housing waiting list. Regeneration to date has not worked for benefit of all communities (residents and businesses) and there is no sign in the plan of changing the destructive redevelopment model (amongst other issues, where homes are lost and replaced by investment properties).

Intense and cumulative development impacts on the environment and people's health in neighbourhoods with already poor air quality and health outcomes. Southwark's relentless redevelopment of land does not benefit all. So called regeneration is taking away industrial uses and the jobs they create for local people to be largely replaced by residential uses. This does not benefit all. Plans around Burgess Park include more intense overlooking from development of tall buildings. This once again favours profits for investors and views for very rich incomers over maintaining the quality of green spaces / amenities for local residents. Likewise a 15 storey tower on Liverpool Grove conservation area will affect heritage amenities for residents there.

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Individual  
NSPPSV56

I do not consider this policy sound.  
The amendments are welcome and go in the right direction, but they do not yet make this policy sound on any of the four tests of soundness – positively

Social regeneration charters are currently in the process of being developed throughout the borough. These will be designated to all of the opportunity areas in the borough and they function to align the communities' priorities and visions for the future of their area and encompass their targets for sustainable development. This will help guide

prepared, justified, effective or consistent with national policy.

- The meaning of 'social regeneration' was not clear in the first submission version. Changing the heading to Regeneration that works for all is a clearer meaning and an excellent aspiration, but changing the name will not make it effective.
- While it was a welcome move to bring social elements into the regeneration of land and buildings in the previous submission version, just attaching it to the planning policies grouped in SP2 about revitalising neighbourhoods did not show how this would make a real difference to the destructive impact of regeneration on current residents, businesses and communities. In this amended policy. SP2 is still attached to the same narrow group of policies P11 to P22. This makes it unclear if or how all the other policies in the NSP relate to this strategic policy.
- 'Social regeneration' also continues to be used in the NSP eg as the now proposed 'social regeneration' charters and place plans for different areas in the borough added to the 'Reasons' for SP2. These appear to rely on "working in partnership with existing local residents and businesses". This is welcome but the current practises in community engagement in planning and regeneration fall very short of real partnership. We have heard recently that these area regeneration charters are already being developed in several areas of the borough. But we know local people active on planning in those areas who have not been engaged in the development of the charters. Effective collaboration with local people to develop the charters and place plans remains an aspiration and not a justified and effective policy.
- This strategic policy SP2 needs to apply to all parts and areas of the borough. Its implementation appears to be related only to areas that will have a 'social regeneration charter and place plans' so is not a comprehensive policy for all areas, and does not meet the requirement to be regeneration that works for all, and so not positively prepared.
- A major issue with regeneration is that it has not served existing communities, and is still not serving them. As soon as a regeneration area is declared the land values increase and local businesses and start up enterprises are squeezed out by rising rents and pressures of landowners to sell, and local

distribution of CIL funds and ensure that allocation of funds is optimum to what has been identified as providing the most benefit to our communities. This aligns the council's desires with our communities' and makes the most of the funds received from developers as part of the regeneration process.

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

residents are also squeezed out by rising rents and rising house prices. So aspiring to 'regeneration that works for all' is not going to be achieved by having social regeneration charters and place plans without a really different way of approaching regeneration and development.

- It is essential for this that no regeneration or redevelopment plan begins for an area without a requirement that there is a 'facts on the ground' audit compiled by the developers with the collaboration of ALL stakeholders in the site, and the report subject to consultation with all those stakeholders. Without this SP2 is not positively prepared or effective. It is welcome that this idea has now appeared in the Council's draft Development Consultation Charter as a preplanning application requirement. But without a requirement that this is done in close collaboration between the developer and the stakeholders on the ground and the result of the audit endorsed by them, there is no assurance that it will be adequate.

- There seems to be an unquestioned assumption that much of the borough needs regeneration led by redevelopment. This is not supported by the facts of areas which have regenerated themselves without major redevelopment, like Central Rye Lane in our local town centre in Peckham. The prevailing redevelopment-led regeneration approach has also been applied to Peckham, but in Central Rye Lane years of consistent action by Peckham Vision has enabled the local community to resist the idea for a part of the town centre around the station. The result is evident for all to see in the thriving local independent culture and leisure local and regional economy that has been able to develop organically and self-regenerate. Our campaigns to resist the demolition plans were rooted in community-led facts on the ground audits and articulation of inherent potential which was being missed or denied by the redevelopment-led approach.

- Borough wide redevelopment underpinning regeneration is disproportionate given the wealth of existing neighbourhood assets and potential which are being ignored by the current policy assumption that assembly of sites for redevelopment is necessary for regeneration. The policy in those respects is not justified.

- The observational evidence is that regeneration does not benefit existing

residents and local businesses that are squeezed out by the effect on land values and demolitions. There is also evidence that continuing disturbance in environments has adverse effects on the health and well being of people affected. These come from a range of factors such as the anxiety and stress from the uncertainties imposed on people's lives to the disturbances through upheaval or construction processes. The more regeneration is based on redevelopment, the more likely there will be harmful effects on the existing residents and businesses. Clearly it will not be benefitting all. The extent of this form of regeneration is not justified as it is not appropriate or proportionate.

- There is only observational and anecdotal evidence of some harmful effects because there has been no long term cohort monitoring of the effects of past and current regenerations. The Council has very welcome aspirations to create some longer term cohort studies in its social regeneration monitoring but these are nowhere near starting and will take years to produce results. The amendments have not changed the way in which the planning policies are encouraging too much of the borough for redevelopment-led regeneration and so it is still not justified, not positively prepared and not effective in creating regeneration that works for all.

Some changes to make the policy sound:

- Find a different way of linking this important Strategic Policy to all the relevant Development Policies and not just policies P11 to P22.
- Insert a policy and an explanation in the Reasons that regeneration will be led by identification and nurturing of what exists in neighbourhoods and not an assumption that unjustified redevelopment is necessary.
- Link this strategic statement to a commitment to a genuine change to collaboration and co-production in neighbourhoods of regeneration charters and place plans.
- Include in the NSP a commitment to work with the community sector to develop robust community processes managed by communities themselves, and not developers or the Council, to enable residents and local businesses to take part in fact based audits and other processes before any redevelopment plans have been started.

Individual  
NSPPSV355

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

- One of the principles that should underpin plan-making is “empowering local people to shape their surroundings”.
- “Local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see. To support this, local planning authorities should aim to involve all sections of the community in the development of Local Plans and in planning decisions, and should facilitate neighbourhood planning.”
- “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

A number of failings in the consultation process have made it more difficult for interested individuals and community groups to engage effectively in shaping the New Southwark Plan. During consultation on the Proposed Submission Version (“PSV”), these included the consultation deadlines set by the Council and the inaccessibility of the PSV and its accompanying documents. Furthermore, throughout the process of developing the Plan, Southwark Council has failed to provide any evidence that it is monitoring the consultation responses it receives or actively seeking to engage individuals and groups from

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The Consultation report for the New Southwark plan is published on the Council’s website, showing how the New Southwark Plan and its consultation procedure are entirely legally compliant and sound.

communities that are typically underrepresented or less engaged in public life.

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

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

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

- The plan does not include the interest of the current leaseholders.
- No mention of the leaseholders and no consultation whatsoever with approximately 274 existing leaseholders currently on the estate
- The new area plan has changed without the knowledge of the leaseholders and residents affected
- The community is systematically being displaced due to the council's new agenda for the estate
- As leaseholders we feel that there is a hidden agenda of social ethnic cleansing
- There is no consideration for the needs of BAME groups affected in the local area and Southwark is categorically failing to carry out its public sector equality duty The new plan should include:
  - New youth centres
  - Learning centre
  - Mother and toddler support group
  - Training centres for the unemployed
  - Apprenticeship support group
  - Business enterprise centre

Individual  
NSPPSV167

Southwark Law Centre welcomes a policy that aims to distribute any benefits enjoyed from regeneration equitably. However, this policy requires changes to

Social regeneration charters are currently in the process of being developed throughout the borough. These will be designated to all of the opportunity areas in the borough and they function to align the

be made to it do support this to happen.

However, Policy SP2 will not achieve its aim to deliver benefits of regeneration equitably because it is ineffective. The policy uses terms such as “wellbeing,” “equity of esteem” and “better lives in stronger communities” without providing a definition of these terms and phrases in a glossary. If “wellbeing” is the “most important outcome of [Southwark’s] regeneration efforts,” SP2 could helpfully provide specific metrics with a baseline to monitor specific SP2 improvements.

To effectively achieve regeneration that works for all using a “more systematic approach to social regeneration,” SP2 must include further detail on the proposed mechanism to deliver this policy. The policy states that social regeneration charters and place plans will be used to implement the framework. However, the policy does not include how these documents should be prepared, details on the decision making process in setting visions and priorities for the areas and how Southwark Council proposes to involve the community in the documents’ preparation. Southwark Law Centre is aware of the production of a Developers Charter that will be significant in the implementing of SP2. This document should be referred to within SP2.

Southwark Council is bound by public sector equality duty. The Equality Act (2010) states that the Council must have due regard to the need to “advance equality of opportunity between people who share a protected characteristic and people who do not share it.” SP2 presents itself as a policy to do this. In reality however, the policy is too vague to deliver “regeneration that works for all.” SP2 refers to “Strengthening support in regeneration areas for those who are vulnerable or who face greater disadvantage by investing in the prevention and tackling the causes of inequality” but it gives no indication to how those who face greater disadvantage will be identified, how investments will be made and how Southwark defines the “causes of inequality.” More information on Social Regeneration Charters and Place Plans should be included, particularly the process in which they are prepared and how they will be used

communities’ priorities and visions for the future of their area and encompass their targets for sustainable development. This will help guide distribution of CIL funds and ensure that allocation of funds is optimum to what has been identified as providing the most benefit to our communities. This aligns the council’s desires with our communities’ and makes the most of the funds received from developers as part of the regeneration process.

Evidence-base for social regeneration charters as a framework for achieving health, wellbeing, equity of esteem and stronger communities is provided in the evidence-base available online titled The Impact of Planning Policy on Health Outcomes and Health Inequalities in Southwark and Lambeth (2017).

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

<p>to deliver SP2.</p> <p>Definitions for terms mentioned above should be provided.</p> <p>SP2 should include the requirement for a fine grained, comprehensive and systematic 'place audit' to be conducted in regeneration areas at the earliest stage possible.</p> <p>This audit should include a needs assessment focused on identifying the needs of people with protected characteristics so that investment is targeted to benefit the most disadvantaged.</p>	
<p>Individual NSPPSV357</p> <p>No consultation or consideration has been made with the existing residents of Kinglake Street - I was only made aware of this after being contacted on the day of the deadline by a member of KTRA. ( which has now 'graciously' been extended by just a few days). Remove the Kinglake and Alvey Estates from the AAAP.</p>	<p>Community consultation during the preparation of the New Southwark Plan has been informed by the Southwark Statement of Community Involvement. This document (SCI) sets out how the council will ensure that local communities, residents, businesses and other stakeholders can be involved in local planning decisions the and preparation of regeneration and planning strategies to help to shape the places in our Borough. This document has recently been revised and a new version will be adopted in early 2020. During the preparation of the New Southwark Plan, we held over 85 consultation events in over 59 locations and we sought to engage as much as the community as possible. Further details relating to consultation can be found in the consultation report.</p> <p>If you would like more immediate communication regarding opportunities to provide consultation responses, please opt-in to our mailing list.</p>
<p>Individual NSPPSV362</p>	<p>Comment noted.</p>

No further comment applied.

Individual  
NSPPSV363

We can see no evidence that LB Southwark has considered the impact of large developments on infrastructure in neighbouring Lambeth. In particular, Coin Street Community Builders owns, manages and maintains Bernie Spain Gardens (and the riverside walkway between Sea Containers and the National Theatre) and recent large developments in the neighbourhood have put intensive pressure, particularly on the Bernie Spain Gardens. To cope with this pressure CSCB has drawn up plans to upgrade the riverside park including new paths, lighting, planting, lawns and facilities for onsite gardeners. Although CSCB pays and will continue to be responsible for the costs of keeping the riverside walkway and park well-managed, we do not have funds for the capital costs of the upgrade - which recently received planning consent. We believe that CIL and section 106 payments from surrounding developments - most of which are in LB Southwark - should be earmarked for necessary improvements to nearby public realm. We do not know whether LB Southwark has considered such issues with LB Lambeth (and so cannot comment on the extent to which the Duty to Co-operate has been met) but we do not believe that sufficient account has been taken of unmet needs in this neighbouring authority. We therefore conclude that the Local Plan does not meet the 'positively prepared' test. We want LB Southwark to consult with LB Lambeth on the impact that developments in both boroughs will have on the public realm and, specifically on Bernie Spain Gardens. We want the New Southwark Plan to require developments west of Blackfriars Road to contribute to the improvement and costs of maintaining neighbouring public realm, including that which falls within the adjacent LB Lambeth.

Southwark provides comment to observations for developments along the border with neighbouring boroughs that have the potential to impact the amenity of Southwark's residents. Historic cases can be found online on our planning portal or by contacting the council directly.

P14 is considered compliant with the Mayor's adopted London Plan (2016) and the emerging draft New London Plan, as the workings of our plan-led approach is set out in the emerging Tall buildings background and research paper with an urban context evaluation section mapping out constraints within the Borough. Further to this specific site allocations have been identified to anticipate tall building development within the guidance section to ensure that there is a clear plan-led approach to constructing tall buildings. The background and research paper also discusses how 'appropriate, sensitive and in appropriate locations' have been identified. The detail of heights however shall not be covered in the NSP as it is a strategic policy document, but rather in the AAP or SPD associated to the area vision of the site allocation.

Individual  
NSPPSV92

I would like to comment on SP2 Regeneration that works for all (Amended Policy)

I would like to speak at the Examination in Public

- I do not consider the Plan to be legal and sound because it is not effective. It has not included the participation of the local community and stakeholders in the area.

- There is a new Social Regeneration Charter for the Old Kent Road which sets out the ways in which Southwark Council intends working with local communities. Yet as a resident of the Old Kent Road who will be hugely impacted by regeneration, neither myself or my neighbours know about it, what it contains nor were invited to participate in its production.

- My immediate neighbourhood will see the delivery of 4000 new homes, mega towers and the displacement of local business and industry but we were not invited to take part in any of the formal processes that led to the formulation of the Masterplan. The result of this is that local communities and stakeholders are unable to contribute local knowledge and expertise and feel disenfranchised as a result.

This policy can be made sound by the following:

- The Council need to be far more rigorous in identifying existing communities and local stakeholders at the start of the regeneration process.
- The knowledge and expertise of these same communities and stakeholders should be harnessed as plans evolve by sense checking and producing information that is readily accessible and understandable.
- Existing, local communities should benefit directly from the sums of money

The Consultation Plan and Consultation Summary are published on the Council's website, showing how the New Southwark Plan. SP2 has been tested for soundness, as it aligns with Policy S1 Developing London's Social Infrastructure in the Mayor's London Plan (proposed) and Policy 3.16 Protection and enhancement of social infrastructure.

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

generated by development and they should be invited participants in the formulation of the S106 agreement.

- It is inevitable that differences of opinion and issues of power will emerge but currently regeneration is development led. This balance needs to shift in favour of local communities for this strategic policy to be made sound.

Individual  
NSPPSV365

Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 relates to the designation of conservation areas and states that:

(1) Every local planning authority—  
2

a. shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and  
b. shall designate those areas as conservation areas.

(2) It shall be the duty of a local planning authority from time to time to review the past exercise of functions under this section and to determine whether any parts or any further parts of their area should be designated as conservation areas; and, if they so determine, they shall designate those parts accordingly.

In correspondence regarding planning application 17/AP/4797 for development at the Burgess Business Park, the Camberwell Society suggested to the Council that the adjoining area comprising Wells Way might warrant designation as a conservation area. The Council responded correctly (in line with para. 186 of the National Planning Policy Framework (NPPF)) that a Historic Area Assessment (HAA) was required to provide the evidence to support a case for designation and to ensure that the concept of conservation was not devalued through the designation of areas that lack special interest.

The Council also confessed that 'at the moment we have limited resources and

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

would not be able to carry out a HAA ourselves'. The Council referred to the instrumental role of the Walworth Society in assisting in the latest designation in March 2016 of the Walworth Road Conservation Area. This appears to evidence that the Council is indeed inadequately resourced to deliver the strategic aim of 'heritage-led regeneration' declared in Policy SP2. The Local Development Scheme Report and Timetable (constituting part of EB02 in the Evidence Base nowhere mentions a review of conservation areas or heritage assets, with the notable exception of the Heritage Supplementary Planning Document which was planned to be adopted in March 2019 after apparently seventeen years of consultation. At the time of writing, this delayed deadline appears to have been missed. In this way, it appears that Policy SP2 as proposed is manifestly unachievable and, hence, defective and unsound.

Individual  
NSPPSV365

Policy SP2 states that the revitalisation of places and neighbourhoods will be achieved through: '5. Ensuring that our existing residents and neighbourhood prosper from good growth by giving people from every community the opportunity to collaborate throughout the regeneration process'.

4

This social regeneration framework, it is stated, 'will be implemented through social regeneration charters and place plans for the different areas in the borough. These will outline how we will achieve our ambitions at a local level and demonstrate how we will collaborate with the community throughout the process'.

Similarly with the foregoing comments about the evidence base for the Council's proposed 'heritage-led development' approach, there is no obvious framework or process in place to create place plans for different areas in the borough, specifically Camberwell.

I am very aware of the Camberwell Area Plan currently being developed by

Designating conservation areas is a different process to the policies within the New Southwark Plan.

Gort Scott. My exchanges with both Gort Scott and the Council's officers leave me in no doubt that Gort Scott's Camberwell Area Plan will have no planning weight because it is explicitly not intended to form part of planning policy in the way that the Aylesbury Area Action Plan or the Old Kent Road Area Action Plan do.

I can safely say that all the Camberwell neighbourhood groups I have spoken to consider this a wasted opportunity. This is why a large number of community groups have gathered together to produce precisely the kind of place plan that Policy SP2 envisages and in the genuinely collaborative manner described by Part 5 of the policy.

Absent a place plan which details and interrogates:

- the massing / height of buildings, to indicate the bulk of acceptable development;
- materiality (brick / concrete / glass / etc), to indicate complementary design;
- historic age of existing development, to indicate contextual architectural style and heritage;
- population density (derived from current electoral roll data / census and consented planning permissions) and PTAL zones and transport stops (tube / train / bus / cycle - current and planned), both to indicate how many people live in an area and how they move in and out of it;
- economic value / productivity / vacancy of planning units (derived through the rating list); and
- uses (Classes A, B, C, D: retail / business / residential / community), to indicate successful and unsuccessful parts of the high street and the mix of uses;

it is hard to see how the needs of a place and its residents can be understood, and how they can be best engaged and their potential unlocked. However bold and well-intentioned the policy itself, it is just as hard to see how the implementation of Policy SP2 (6) can be positively prepared, justified, effective or, frankly, consistent with national policy.

There is, moreover, equally substantial doubt that AV.04 Camberwell Area Vision has been positively prepared and justified in planning terms. I fear that it is so substantially defective that like its 2012/13 precursors, this new area

vision too will fall into the long grass.

Individual  
NSPPSV367

I do not consider the policy to be legal and sound because it does not comply with the National Planning Policy Framework and the London Plan or the Mayor's Good Practice Guide to Estate Regeneration (2018). This policy is not justified as their regeneration strategy does not work for all. On page 8 of Mayor's Good Practice Guide to Estate Regeneration (2018) there is an option for the refurbishment of existing homes and that demolition should be assessed against the wider social and environmental impacts. On the Aylesbury Estate there has been no consultation with tenants and resident associations (T&RAs). I visited one T&RA recently which knew nothing about the NSP or how it would affect them. There has been no assessment of the wider social and environmental impact of the regeneration so far. There is no evidence that the 14 years since the regeneration started on the Aylesbury Estate has provided more benefits to the community. The impact of regeneration on leaseholders after they have been forced to sell their properties has not been assessed and there is no mention to do so in this policy. I have recently been forced to sell my property by compulsory purchase and was left with no home to go to and in complete financial difficulties. Southwark Council have not produced a regeneration for all. They do not take their Equality Duties seriously as many residents are over 50 and of protected characteristics and do not want to have to move twice to be back in their community. They fail to plan any phasing of estates correctly to minimize disruption to residents and leave residents in derelict areas. They fail to provide policies for leaseholders whose marriages have broken down and cannot sell to anyone other than the council. The option for leaseholders to go to Lands Tribunal is unaffordable for leaseholders as it can cost in excess of £50,000. Leaseholders have no way of claiming back all costs when regeneration schemes like the Aylesbury Estate

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

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

Sustainability Appraisals (SAs) are also required to satisfy the European Directive 2001/42/EC. The Directive requires a formal Strategic Environmental Assessment (SEA) of certain plans and programmes that are likely to have significant effects on the environment. SEA is transposed into UK legislation through the Environment Assessment of Plans and Programmes Regulations 2004. SEA is focused primarily on environmental effects, whereas SA goes further by examining all the sustainability related effects of plans, whether they are social, environmental or economic.

Our integrated impact assessment and Equalities Impact Assessment can be found online with each published policy update.

<p>have affected their homes for 14 years. The council refuse to provide information needed to be able to fully claim losses back. I would like to speak at the Examination in Public.</p>	
<p>Individual NSPPSV373</p> <p>The fine words in this amended policy evidently mean something completely different to Southwark Council than they do to me unless it is about to withdraw the planning permissions it has recently granted on the Old Kent Road. Ruby Triangle, Cantium and Southernwood are examples of its “strategy for regeneration” in practice; they are totally contrary to all the aspirations in this policy. This policy is therefore unsound, ineffective and not properly prepared. Building heights to be limited to an urban scale which human beings can relate to, to make positive healthy neighbourhoods and good quality homes for all.</p> <p>Southwark to consult with existing residents honestly and meaningfully because the only way they will get good urban growth is with the wholehearted support of the local population. Planning permissions given to Ruby Triangle, Cantium Retail Park and Southernwood Retail Park are to be withdrawn because they violate the aspirations in the amended New Southwark Plan.</p>	<p>Objection noted. Community consultation can be found in the officer report. Consultation summary can be found on the overall Old Kent Road Area Action Plan on the Old Kent Road website.</p> <p>Community consultation during the preparation of the New Southwark Plan has been informed by the Southwark Statement of Community Involvement. This document (SCI) sets out how the council will ensure that local communities, residents, businesses and other stakeholders can be involved in local planning decisions the and preparation of regeneration and planning strategies to help to shape the places in our Borough. This document has recently been revised and a new version will be adopted in early 2020. During the preparation of the New Southwark Plan, we held over 85 consultation events in over 59 locations and we sought to engage as much as the community as possible. Further details relating to consultation can be found in the consultation report.</p>
<p>Individual NSPPSV374</p> <p>We support the aims and objectives of this policy. However, we wish to comment on the following new text that has been inserted at part 3 of the</p>	<p>Support noted. No changes needed.</p>

policy:

“Encouraging greater tenure integration and equality within and between new development in order to create the conditions for properly mixed and integrated communities, ensuring equity of esteem from street level, and to mitigate against stark visible differences and a sense of tenure segregation;”

Lendlease has a tenure blind approach to delivering all forms of housing, and so we support the aim of this new wording and of the policy as a whole. However we would like to highlight that there are and will always be specific instances in which Registered Provider’s requirements have implications for the way in which different tenures can be located or accessed in order to support the delivery and management of these housing products at the levels of affordability that are required. In such cases, particular design solutions may be needed in response to an RP’s needs which would not fully align with the proposed policy wording but would, we feel, still meet its objective. Where this is required in order to meet the needs of those vulnerable groups, we consider that the priority should be to ensure that the housing need is met.

Individual  
NSPPSV375

I do not consider the policy to be legal and sound because it does not comply with the National Planning Policy Framework and the London Plan or the Mayor’s Good Practice Guide to Estate Regeneration (2018). This policy is not justified as their regeneration strategy does not work for all. On page 8 of Mayor’s Good Practice Guide to Estate Regeneration (2018) there is an option for the refurbishment of existing homes and that demolition should be assessed against the wider social and environmental impacts. On the Aylesbury Estate there has been no consultation with tenants and resident associations (T&RAs). I visited one T&RA recently which knew nothing about the NSP or how it would affect them. There has been no assessment of

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

Community consultation can be found in our Consultation Summary published on our website. Wider assessment of social and environmental impacts of regeneration so far is undertaken and monitored in our Integrated Impact Assessment, which is a requirement under the Public Sector Equalities Duty (2011) (under section 149 of the Equalities Act

the wider social and environmental impact of the regeneration so far. There is no evidence that the 14 years since the regeneration started on the Aylesbury Estate has provided more benefits to the community.

The impact of regeneration on leaseholders after they have been forced to sell their properties has not been assessed and there is no mention to do so in this policy. I have recently been forced to sell my property by compulsory purchase and was left with no home to go to and in complete financial difficulties.

Southwark Council have not produced a regeneration for all.

They do not take their Equality Duties seriously as many residents are over 50 and of protected characteristics and do not want to have to move twice to be back in their community.

They fail to plan any phasing of estates correctly to minimize disruption to residents and leave residents in derelict areas.

They fail to provide policies for leaseholders whose marriages have broken down and cannot sell to anyone other than the council.

The option for leaseholders to go to Lands Tribunal is unaffordable for leaseholders as it can cost in excess of £50,000. Leaseholders have no way of claiming back all costs when regeneration schemes like the Aylesbury Estate have affected their homes for 14 years.

The council refuse to provide information needed to be able to fully claim losses back.

I would like to speak at the Examination in Public.

2010). The council carries out Equalities Analysis (EqIA) of its plans, decisions and programmes to consider the potential impact (positive and negative) of proposals on the key 'protected characteristics' in the Equality Act 2010 and on Human Rights.

Sustainability Appraisals (SAs) are also required to satisfy the European Directive 2001/42/EC. The Directive requires a formal Strategic Environmental Assessment (SEA) of certain plans and programmes that are likely to have significant effects on the environment. SEA is transposed into UK legislation through the Environment Assessment of Plans and Programmes Regulations 2004. SEA is focused primarily on environmental effects, whereas SA goes further by examining all the sustainability related effects of plans, whether they are social, environmental or economic.

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Individual  
NSPPSV375

This policy does adhere with the National Planning Policy Framework, the London Plan and the Mayor's Good Practice Guide to Estate Regeneration (2018) because the Council does ensure that adequate assessment is made

I do not consider the policy to be legal and sound because it does not comply with the National Planning Policy Framework and the London Plan or the Mayor's Good Practice Guide to Estate Regeneration (2018). This policy is not justified as their regeneration strategy does not work for all. On page 8 of Mayor's Good Practice Guide to Estate Regeneration (2018) there is an option for the refurbishment of existing homes and that demolition should be assessed against the wider social and environmental impacts. On the Aylesbury Estate there has been no consultation with tenants and resident associations (T&RAs). I visited one T&RA recently which knew nothing about the NSP or how it would affect them. There has been no assessment of the wider social and environmental impact of the regeneration so far. There is no evidence that the 14 years since the regeneration started on the Aylesbury Estate has provided more benefits to the community. The impact of regeneration on leaseholders after they have been forced to sell their properties has not been assessed and there is no mention to do so in this policy. I have recently been forced to sell my property by compulsory purchase and was left with no home to go to and in complete financial difficulties. Southwark Council have not produced a regeneration for all. They do not take their Equality Duties seriously as many residents are over 50 and of protected characteristics and do not want to have to move twice to be back in their community. They fail to plan any phasing of estates correctly to minimize disruption to residents and leave residents in derelict areas. They fail to provide policies for leaseholders whose marriages have broken down and cannot sell to anyone other than the council. The option for leaseholders to go to Lands Tribunal is unaffordable for leaseholders as it can cost in excess of £50,000. Leaseholders have no way of claiming back all costs when regeneration schemes like the Aylesbury Estate have affected their homes for 14 years. The council refuse to provide information needed to be able to fully claim losses back. I would like to speak at the Examination in Public.

before approval of a demolition, that refurbishment of the existing homes would not be viable in order to achieve the same targeted benefits that the demolition would, whilst following P9: Optimising delivery of new homes and the Residential Design Standards.

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

Sustainability Appraisals (SAs) are also required to satisfy the European Directive 2001/42/EC. The Directive requires a formal Strategic Environmental Assessment (SEA) of certain plans and programmes that are likely to have significant effects on the environment. SEA is transposed into UK legislation through the Environment Assessment of Plans and Programmes Regulations 2004. SEA is focused primarily on environmental effects, whereas SA goes further by examining all the sustainability related effects of plans, whether they are social, environmental or economic.

Our integrated impact assessment and Equalities Impact Assessment can be found online with each published policy update.

Individual  
NSPPSV97

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

I am concerned that this round of consultation does not seem to be 'full' or 'fair' in that it did not formally notify those that had previously commented on the New Southwark Plan, and did not consult as widely, or in as many different ways, as for the New Southwark Plan. I refer to the Law Centre's advice that "The New Southwark Plan is not legally compliant because Southwark changed their consultation procedure mid-way through Regulation 17 unlawfully. There is a legitimate expectation that this round of consultation should be procedurally identical to previous rounds of consultation at this stage." Their letter of the 13th of May 2019 (attached) sets out these arguments in greater detail and I support their points.

I wish to appear at the Examination in Public regarding these issues.

Policy SP2: Regeneration that works for all is unsound because:

- it is not positively prepared or effective.

This policy should apply to all areas. Currently it only covers areas that will have a "social regeneration charter and place plans" so is not a comprehensive policy meeting the requirement to be regeneration that works for all.

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

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A major issue with 'regeneration' is that it often disadvantages large sectors of the existing community through increases in land value. There are examples where 'regeneration' has benefitted the more vulnerable members of the existing community rather than pushing them out, and I would recommend that these be looked at as a possible model for Southwark, particularly Peckham. These models are based on Council facilitated/community run consultation rather than redevelopment of the built environment. Rye Lane already is an example (not perfect but with many good points) of this. It is essential that any regeneration or redevelopment starts, and is led by, ALL stakeholders in the site.

- it is not justified.

The implied assumption that so much of the borough needs regeneration led by redevelopment is not supported by the facts of areas which have regenerated themselves without major redevelopment, like Central Rye Lane. Borough wide redevelopment underpinning regeneration is disproportionate given the wealth of existing neighbourhood assets and potential which are being ignored by the current policy assumption that assembly of sites for redevelopment is necessary for regeneration. Changes that would make the policy sound include:

- I would be happy to propose changes in the Examination in Public.

Individual  
NSPPSV97

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Community consultation can be found in our Consultation Summary

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Changes that would make the policy sound include:

I would be happy to propose changes in the Examination in Public.

Individual  
NSPPSV380

Southwark Council residents on Southwark Council's Housing Waiting List: The planning approval for the regeneration of the Aylesbury Estate, 14/AP/3844, is predicated on the loss of 778 homes for social rent and it is predicated on the loss of 237 affordable homes: see Table 14 from the Planning Officer's Report. 941 homes for social rent have already been lost in the Heygate regeneration, and 778 homes for social rent are currently being lost in the Aylesbury

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regeneration.

So a total of 1719 homes for social rent are being lost in Southwark with just these two regeneration schemes. That means just these two regeneration schemes are resulting in 1719 fewer homes available for the thousands of people on Southwark Council's Housing Waiting List.

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

Strategic Policy SP2: Regeneration that works for all presents no explanation as to how the loss of 778 homes for social rent or 237 affordable homes in the Aylesbury regeneration, for example, can benefit the 'particularly existing residents' on Southwark Council's Housing Waiting List.

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

Clearly Regeneration that works for all will need to stop the haemorrhaging of social housing in Southwark if Regeneration that works for all is to work for the many thousands of Southwark residents currently on its Housing Waiting List. In each of the most recent 4 weeks of bidding cycles (to Sunday 12 May 2019) for one-bedroom flats there were a grand total of 1, 1, 2 and 2 flats, respectively, available for Southwark residents bidding! In consequence there were more than 500 Southwark residents bidding for just one flat. Strategic Policy SP2: Regeneration that works for all presents no explanation as to how these chronic circumstances will be or can be turned around.

Strategic Policy SP2: Regeneration that works for all is therefore Unsound as it has not been positively prepared, it is not justified, and it is not effective.

Aylesbury Leaseholders subject to Compulsory Purchase Orders on their homes.

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

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Implementation Policy IP4: Compulsory purchase order (CPO) states that “Compulsory Purchase Orders (CPOs) are legal tools available for planning authorities to use to compulsorily purchase land which is owned by a non-co-operating party. Implementing CPOs is a long process that is used as a last resort when all other options, including negotiation, have been exhausted.” It is noticeable that the Implementation Policy refers to ‘land’, but makes no mention of compulsorily purchasing people’s homes. It also mentions “a last resort when all other options.. have been exhausted.”

We know this to be factually wrong in the numerous cases on the Aylesbury Estate: not one of the Leaseholders on the Aylesbury Estate was offered - or is currently being offered - a like-for-like replacement of their home, on the same ownership terms, in the same area.

This option is one which many people would consider to be the most moral option - indeed, maybe the only moral option - when Southwark Council is forcibly evicting people from their own homes – which they own – against their will.

The Public statement from the Aylesbury Leaseholders Action Group, following the Compulsory Purchase Order ruling on 14 November 2018 includes the following:

“we have always said that the regeneration of our estate should not mean that the council can take our homes and leave us in a worse situation than before. The estate should either be refurbished for its current residents, or we should be offered a like-for-like replacement home: NOT a shared ownership that will put us back into debt, NOT a shared equity with less rights, NOT a flat outside of London away from our families, jobs, communities and networks. None of these options are acceptable for us.

We have lived and contributed to this community for years and decades: with a lot of effort and work we have bought our flats. Many of us will never be able to get another mortgage: many of us are on low incomes, many of us are getting on, many are from migrant backgrounds and have struggled hard to make a life in this country for us and our kids. We do not deserve to pay the

price of this regeneration!”

Strategic Policy SP2: Regeneration that works for all must include all the Leaseholders being evicted from their own homes throughout the regeneration processes, and explain how the regeneration will work for them. But the Leaseholders don't even merit a mention in the proposed Policy! Strategic Policy SP2: Regeneration that works for all is therefore Unsound as it has not been positively prepared, it is not justified, and it is not effective.

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

The current regeneration proposals for numerous residential towers overlooking Burgess Park – up to 20 storeys tall, along Albany Road - are in direct conflict with New Southwark Plan Policy P18: Conservation of the historic environment and natural heritage, which states that new development must:

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

iv. Registered parks and gardens”; and New Southwark Plan Policy P54:

Protection of amenity states that:

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

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

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

proposed increased density could cause further severe harm if building heights are not limited to 10 storeys along Albany Road. Strategic Policy SP2: Regeneration that works for all doesn't explain how regeneration that works for all will work for Burgess Park, a major heritage asset, and one of the Borough's areas most affected by regeneration.

This Strategic Policy SP2 is therefore Unsound as it has not been positively prepared, it is not justified, and it is not effective.

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heritage asset, and one of the Borough's areas most affected by regeneration. This Strategic Policy SP2 is therefore Unsound as it has not been positively prepared, it is not justified, and it is not effective.

Approved towers overlooking Burgess Park – approved by Southwark Planners: 12 storeys added, in direct conflict with the Aylesbury Area Action Plan. The Aylesbury Area Action Plan showed 2 “local landmark buildings of between 10 and 15 storeys”. But the Planners approved 3 towers: one 14 storeys, one 18 storeys, and one 20 storeys – that means 12 extra storeys. The reason is clear: greed – at the direct expense of Burgess Park and its users. The proposed towers are 100% for private sale – replacing lower Aylesbury buildings that were designed and built as 100% social housing. The existing 10 storey building - called Arments Court - is added on the left to give a better idea of the colossal scale of the approved towers. The consequences for Burgess Park are permanent and severe harm, due to its loss of amenity from tall towers overlooking the park. The Amenity of Burgess Park is supposed to be ‘protected’ according to planning policies.

The proposed Aylesbury Area Vision proposes an open ended increase in density. Southwark Planners have already approved severe harm to Burgess Park. With an increase in density on the Aylesbury, the possibility of having many more towers and/or towers of increased height overlooking Burgess Park is real and imminent. An increase in density is acceptable and achievable without harming Burgess Park: the lower buildings of 5 or 6 storeys can be increased to 10 storeys. Buildings of 10 storeys can be screened from the park - thereby preserving its amenity value - but not towers of 15 or 20 storeys. Strategic Policy SP2 Regeneration that works for all is Unsound as it is not effective in protecting our heritage assets.

Aylesbury Area Action Plan Introduction: “Design excellence will be at the core of the redevelopment and we will emphasise and control design quality at each stage of the project to create a varied and interesting new residential neighbourhood.”

Existing Core Strategy Strategic Policy 12 – Design and conservation:

“Development will achieve the highest possible standards of design of buildings and public places to help create attractive and distinct places which are safe, easy to get around and a pleasure to be in. We will do this by expecting development to conserve or enhance the significance of Southwark’s heritage assets, their settings and wider historic environment, including conservation areas”.

Result: Urban vandalism on Plot 18 promoted and approved by Southwark Council Planners and approved by the Design Review Panel: The Thug 15 storey tower.

Amended Policy SP2 proposes: “Enhancing local distinctiveness and heritage-led regeneration by requiring the highest possible standards of design, creating vibrant, attractive, healthy, safe and distinctive buildings and places that install pride of place in our communities. This will include green infrastructure and opportunities for healthy activities and improving streets, squares and public places between buildings”

Strategic Policy SP2: Regeneration that works for all doesn’t explain how regeneration that works for all will work by “enhancing local distinctiveness and heritage-led regeneration” for Liverpool Grove Conservation Area, a major heritage asset, and one of the Borough’s areas most affected by regeneration. Southwark Planners and the Design Review Panel have clearly demonstrated that they are not capable. Strategic Policy SP2 Regeneration that works for all is therefore Unsound as it has not been positively prepared, it is not justified, and it is not effective.

Aylesbury Road and the Liverpool Grove Conservation Area are in the process of being vandalised: existing street pattern ignored; existing green open space permanently destroyed. Every tree at the end of Aylesbury road - what used to be its green urban vista - has been cut down, to be replaced by a vandalising 15 storey Thug tower. Strategic Policy SP2: Regeneration that works for all doesn’t explain how regeneration that works for all will work by “enhancing local distinctiveness and heritage-led regeneration” for Liverpool Grove

Conservation Area, a major heritage asset.

Planners not fit for purpose:

Senior Planner Daniel Davies' 111 page Report to Southwark Council's Planning Committee, 23 April 2015, makes not one single mention of Aylesbury Road.

Result: Urban vandalism promoted and approved by Southwark Council Planners and approved by the Design Review Panel: The 15 storey Thug tower.

Strategic Policy SP2 Regeneration that works for all is therefore Unsound as it has not been positively prepared, it is not justified, and it is not effective.

1. Aylesbury Area Action Plan Introduction: "Design excellence will be at the core of the redevelopment and we will emphasise and control design quality at each stage of the project to

create a varied and interesting new residential neighbourhood."

2. Aylesbury Area Action Plan Public Life says: PL1: Street layout. The street layout should accord with the masterplan as shown in Figure 5.

Planners and architects say NO: The street layout directly contradicts the masterplan.

'Independent' DRP says: "we endorse the proposals."

3. Aylesbury Area Action Plan Public Life says: PL2: Design principles. Development should follow the block layout shown on the masterplan.

Planners and architects say NO: The block layout directly contradicts the masterplan.

'Independent' DRP says: "we endorse the proposals."

4. Southwark Plan policies say: Policy 3.15 – Conservation of the Historic Environment. Development should preserve or enhance the special interest or historic character or appearance of buildings or areas of historical or architectural significance. Planning proposals that have an adverse effect on the historic environment will not be permitted.

Planners say Nothing, literally: In the Planning Officer's 111 page Report, Aylesbury Road is never once mentioned.

'Independent' DRP says: "we endorse the proposals."

5. Southwark Plan policies say: Policy 3.18 - Setting of Listed Buildings,

### Conservation Areas and World Heritage Sites

Permission will not be granted for developments that would not preserve or enhance:

- iii. The setting of the Conservation Area; or
- iv. Views into or out of a Conservation Area.

Planners say Nothing, literally: In the Planning Officer's 111 page Report, Aylesbury Road is never once mentioned.

'Independent' DRP says: "we endorse the proposals."

6. Core Strategy Strategic Policy 12 – Design and conservation says:

Development will achieve the highest possible standards of design of buildings and public places to help create attractive

and distinct places. We will do this by expecting development to conserve or enhance the significance of Southwark's heritage assets, their settings and wider historic environment, including conservation areas.

Planners and architects say Nothing, literally: In the Planning Officer's 111 page Report, Aylesbury Road is never once mentioned.

'Independent' DRP says: "we endorse the proposals."

New Southwark Plan Policy P11: Design of places states that

"Development must: Ensure height, scale, massing and arrangement respond positively to the existing townscape, character and context; and Ensure the urban grain and site layout take account of and improve existing patterns of development and movement, permeability and street widths."

The current proposals for Aylesbury Plot 18 are in direct conflict with all of the policies listed, including new Southwark Plan Policy P11: Design of places.

Regeneration that works for all is emphatically not working for Liverpool Grove Conservation Area.

Strategic Policy SP2 Regeneration that works for all is therefore Unsound as it has not been positively prepared, it is not justified, and it is not effective.

So why would an 'Independent' Design Review Panel endorse proposals which:  
Directly contradict the words of the AAAP Masterplan: MP1 The masterplan;  
Directly contradict the map of the AAAP Masterplan: MP1 The masterplan;

Directly contradict AAAP Public Life PL1: Street layout;  
Directly contradict AAAP Public Life PL2: Design principles;  
Directly contradict Core Strategy: Strategic Policy 12 – Design and conservation;  
Directly contradict Southwark Plan: Policy 3.15 – Conservation Of The Historic Environment;  
Directly contradict Southwark Plan: Policy 3.18 – Setting Of Listed Buildings, Conservation Areas and World Heritage Sites

Some clues:

1. The owners of all those planning policies?  
Answer: Southwark Council, Planning policy and research team.
2. The applicant for the Aylesbury Regeneration?  
Answer: Southwark Council via its Planning office.
3. So the people who were proposing directly contradicting all the Planning policy and research team's policies?  
Answer: Southwark Council, Planning office.

Who was tasked to review and provide advice on the Aylesbury regeneration?

Answer: The 'Independent' Design Review Panel.

How did that work?

Answer: There were two Design Review Panel reviews for Aylesbury Plot 18: first one 20th March 2015 with just two Panel members: "In conclusion, the Panel did not comment on the architectural expression or the proposed form of development"; second review 26th August 2015 with just three Panel members: "they endorsed the strategic approach to the site" "In conclusion the Panel broadly endorsed the proposals." [Extracts from DRP Reports 20 Mar 2015 and 26 Aug 2015]

So how 'Independent' was the 'Independent' Design Review Panel?

Answer: Not remotely 'Independent'.

Why is that?

Answer: Most of the members of the Design Review Panel are architects, and most if not all of those have dealt with Southwark Council's Planning Office – often multiple times - through planning applications that have been approved

for buildings in the Borough.

Answer: One of just two Design Review Panel members (from a panel of 40 or 50) who bothered to show up for the first review of Aylesbury Plot 18, and one of just three for the second review – is a Director of a Planning and Urban Design company called Tibbalds. According to their website – extract here – Tibbalds “was appointed to provide a bespoke urban design training course for Southwark officers ten years on from a similar course that we devised and led.” So Tibbalds were twice paid by Southwark Council to train its planners, and a Director of that company was reviewing the proposals being promoted by the Planning office of the Council that paid her company to train its planners. So the Design Review Panel – meant to be ‘Independent’ - is not really ‘Independent’?

Answer: Not remotely ‘Independent’.

Individual  
NSPPSV380

I believe the proposed amended Strategic Policy SP2 – Regeneration that works for all is Unsound, as it has not been positively prepared, it is not justified, and it is not effective.

The reasons are set out in this document.

I wish to speak at the Examination in Public. SP2. Regeneration that works for all – regeneration that doesn’t work for residents on the Housing Waiting List.

Vision: everyone can access the benefits of our regeneration programmes.

Reality:

1719 homes for social rent being lost in two schemes

Southwark Council residents on Southwark Council’s Housing Waiting List:

The planning approval for the regeneration of the Aylesbury Estate, 14/AP/3844, is predicated on the loss of 778 homes for social rent and it is predicated on the loss of homes for social rent have already been lost in the

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

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Heygate regeneration, and 778 homes for social rent are currently being lost in the Aylesbury regeneration.

So a total of 1719 homes for social rent are being lost in Southwark with just these two 237 affordable homes: see Table 14 from the Planning Officer's Report, on the right. regeneration schemes. That means just these two regeneration schemes are resulting in 1719 fewer homes available for the thousands of people on Southwark Council's Housing Waiting List.

As Lady Bracknell might say regarding the Heygate and Aylesbury:

"To lose one huge estate of social housing, Southwark Council, might be regarded as a misfortune; to lose both looks like carelessness!"

The proposed Strategic Policy SP2 states: "We will continue to revitalise our places and neighbourhoods to create new opportunities for residents,.."; and "2. Investing in our communities and residents, and particularly existing residents, so that everyone can access the benefits of our regeneration programmes and the opportunities created by Aylesbury regeneration: Planning Officer's Report, 23 April 2015

those programmes for new homes, new jobs, education, training and new infrastructure."

Strategic Policy SP2: Regeneration that works for all presents no explanation as to how the loss of 778 homes for social rent or 237 affordable homes in the Aylesbury regeneration, for example, can benefit the 'particularly existing residents' on Southwark

Council's Housing Waiting List. According to Government Live Tables figures for the four most recent years, 2014 to 2018,

Southwark Council has lost 540 units of its local authority dwelling stock. See extract from Table

116 above: Southwark local authority dwelling stock was 39,029 in 2014 and 38,489 in 2018.

That is a loss of 540 units.

Clearly Regeneration that works for all will need to stop the haemorrhaging of social housing in Southwark if Regeneration that works for all is to work for the many thousands of Southwark residents currently on its Housing Waiting List.

negative) of proposals on the key 'protected characteristics' in the Equality Act 2010 and on Human Rights.

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Strategic Policy SP2: Regeneration that works for all is therefore Unsound as it has not been positively prepared, it is not justified, and it is not effective.

Vision: Reality:

everyone can access the benefits of our regeneration programmes

Leaseholders being forcibly evicted from their homes against their will

Aylesbury Leaseholders subject to Compulsory Purchase Orders on their homes.

Implementation Policy IP4: Compulsory purchase order (CPO) states that “Compulsory Purchase Orders (CPOs) are legal tools available for planning authorities to use to compulsorily purchase land which is owned by a non-co-operating party. Implementing CPOs is a long process that is used as a last resort when all other options, including negotiation, have been exhausted.” It is noticeable that the Implementation Policy refers to ‘land’, but makes no mention of compulsorily purchasing people’s homes. It also mentions “a last resort when all other options.. have been exhausted.”

We know this to be factually wrong in the numerous cases on the Aylesbury Estate: not one of the Leaseholders on the Aylesbury Estate was offered - or is currently being offered - a like-for-like replacement of their home, on the same ownership terms, in the same area.

This option is one which many people would consider to be the most moral option - indeed,

maybe the only moral option - when Southwark Council is forcibly evicting people from their own homes – which they own – against their will.

The Public statement from the Aylesbury Leaseholders Action Group, right, following the

Compulsory Purchase Order ruling on 14 November 2018 includes the following:

“we have always said that the regeneration of our estate should not mean that the council can take our homes and leave us in a worse situation than before. The estate should either be refurbished for its current residents, or we should be offered a like-for-like replacement home: NOT a shared ownership that will put us back into debt, NOT a shared equity with less rights, NOT a flat outside of London away from our families, jobs, communities and networks. None of these options are acceptable for us. We have lived and contributed to this community for years and decades: with a lot of effort and work we have bought our flats. Many of us will never be able to get another mortgage: many of us are on low incomes, many of us are getting on, many are from migrant backgrounds and have struggled hard to make a life in this country for us and our kids. We do not deserve to pay the price of this regeneration!”

Strategic Policy SP2: Regeneration that works for all must include all the Leaseholders being evicted from their own homes throughout the regeneration processes, and explain how the regeneration will work for them. But the Leaseholders don't even merit a mention in the proposed Policy!

Strategic Policy SP2: Regeneration that works for all is therefore Unsound as it has not been positively prepared, it is not justified, and it is not effective.

Aylesbury Area Action Plan 2010 – p48 and p49: 4 proposed towers on Albany Road. With a great deal of planning, planting, and decades of time, it is possible to screen 10 storey buildings outside the perimeter of the park. Successful examples include buildings along Prince Albert Road on the north side of

Regent's Park;

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

along Bayswater Road between Porchester Terrace and Inverness Terrace on the north

side of Kensington Gardens; and along Piccadilly on the north side of The Green Park.

the the amenity value of parks can be seen at the Lancaster Gate Hotel on Bayswater Road, overlooking both Hyde Park and Kensington gardens, or, nearer home, the tower alongside Southwark Park. Burgess Park is designated both as Metropolitan Open Land (MOL), and also as a Site of Importance for Nature Conservation (SINC).

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

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

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

iv. Registered parks and gardens”; and New Southwark Plan Policy P54:

Protection of amenity states that:

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

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

Strategic Policy SP2: Regeneration that works for all should mean regeneration that causes no harm of any kind to Metropolitan Open Land or a Site of

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

This Strategic Policy SP2 is therefore Unsound as it has not been positively prepared, it is not justified, and it is not effective. Burgess Park is designated both as Metropolitan Open Land (MOL), and also as a Site of Importance for Nature Conservation (SINC).

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next pages). Strategic Policy

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overlooking Burgess Park – up to 20 storeys tall, along Albany Road - are in direct conflict with New Southwark Plan Policy P18: Conservation of the historic environment and natural heritage, which states that new development must: “1.1 Conserve and enhance the significance of the following heritage assets and their settings: iv. Registered parks and gardens”;

and New Southwark Plan Policy P54: Protection of amenity states that:

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

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

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

Strategic Policy SP2: Regeneration that works for all doesn't explain how regeneration that works for all will work for Burgess Park, a major heritage asset, and one of the Borough's areas most affected by regeneration. This Strategic Policy SP2 is therefore Unsound as it has not been positively prepared, it is not justified, and it is not effective. The 10 to 12 storey buildings in the photos on the left and right can also be seen – if you look very, very carefully – in the central photo, taken nearby in Kensington Gardens.

This is that 10 buildings can be screened from a park Other good examples of 10 storey approx one example demonstrating storey park. storey, approx, buildings that don't harm the adjacent parks are the fine apartment buildings

along Prince Albert Road on the north side of Regents Park, and the buildings along Piccadilly on the north side of The Green Park. Buildings of 9, 10, 11 storeys are 'everywhere', as these examples from Pimlico Road, Sloane Avenue and Old Kent Road show. The first two are in areas of highest density. Anyone hoping to plan high density buildings that don't harm our urban realm would do well to follow the Latin word of exhortation: "Circumspice". It means 'look around'.

The proposed Strategic Policy SP2 Regeneration that works for all is Unsound as it has not been positively prepared: there is no explanation of what increased density is proposed for the Aylesbury, nor that increased density will be achieved. The Policy is therefore not justified and not effective. Protecting our heritage assets, especially Burgess Park. Approved towers overlooking Burgess Park – approved by Southwark Planners: 12 storeys added, in direct conflict with the Aylesbury Area Action Plan.

The Aylesbury Area Action Plan showed 2 "local landmark buildings of between 10 and 15 storeys" – see page 4 in this document. But the Planners approved 3 towers: one 14 storeys, one 18 storeys, and one 20 storeys – that means 12 extra storeys, highlighted in red above. The reason is clear: greed – at the direct expense of Burgess Park and its users. The proposed towers are 100% for private sale – replacing lower Aylesbury buildings that were designed and built as 100% social housing. The existing 10 storey building - called Arments Court - is added on the left to give a better idea of the colossal scale of the approved towers. The consequences for Burgess Park are permanent and severe harm, due to its loss of amenity from tall towers overlooking the park.

The Amenity of Burgess Park is supposed to be 'protected' according to planning policies.

The proposed Aylesbury Area Vision proposes an open ended increase in density. Southwark Planners have already approved severe harm to Burgess Park. With an increase in density on the Aylesbury, the possibility of having many more towers and/or towers of increased height overlooking Burgess Park is real and imminent. An increase in density is acceptable and achievable without harming Burgess Park: the lower buildings of 5 or 6 storeys – some

shown above - can be increased to 10 storeys. As shown in this document, buildings of 10 storeys can be screened from the park - thereby preserving its amenity value - but not towers of 15 or 20 storeys. Strategic Policy SP2 Regeneration that works for all is Unsound as it is not effective in protecting our heritage assets. Aylesbury Area Action Plan Introduction: "Design excellence will be at the core of the redevelopment and we will emphasise and control design quality at each stage of the project to create a varied and interesting new residential neighbourhood."

Existing Core Strategy Strategic Policy 12 – Design and conservation:

"Development will achieve the highest possible standards of design of buildings and public places to help create attractive and distinct places which are safe, easy to get around and a pleasure to be in. We will do this by expecting development to conserve or enhance the significance of Southwark's heritage assets, their settings and wider historic environment, including conservation areas".

Result: Urban vandalism promoted and approved by Southwark Council Planners and approved by the Design Review Panel: The Thug.

Amended Policy SP2 proposes: "Enhancing local distinctiveness and heritage-led regeneration by requiring the highest possible standards of design, creating vibrant, attractive, healthy, safe and distinctive buildings and places that install pride of place in our communities. This will include green infrastructure and opportunities for healthy activities and improving streets, squares and public places between buildings"

Strategic Policy SP2: Regeneration that works for all doesn't explain how regeneration that works for all will work by "enhancing local distinctiveness and heritage-led regeneration" for Liverpool Grove Conservation Area, a major heritage asset, and one of the Borough's areas most affected by regeneration. Southwark Planners and the Design Review Panel have clearly demonstrated that they are not capable. Strategic Policy SP2 Regeneration that works for all is therefore Unsound as it has not been positively prepared, it is not justified, and it is not effective. Aylesbury Road and the Liverpool Grove Conservation Area are in the process of being vandalised: existing street pattern ignored; existing green open space permanently destroyed. Every tree in these images from just

a few years ago – 2015 and 2016 - has been cut down, to be replaced by a vandalising 15 storey Thug tower. Strategic Policy SP2: Regeneration that works for all doesn't explain how regeneration that works for all will work by "enhancing local distinctiveness and heritage-led regeneration" for Liverpool Grove Conservation Area, a major heritage asset.

Strategic Policy SP2 Regeneration that works for all is therefore Unsound as it has not been positively prepared, it is not justified, and it is not effective.

Planners not fit for purpose:

These two extracts, on the right, are from pages 45 and 46 of Senior Planner Daniel Davies' 111 page Report to Southwark Council's Planning Committee, 23 April 2015, which makes not one single mention of Aylesbury Road.

Result: Urban vandalism promoted and approved by Southwark Council Planners and approved by the Design

Review Panel: The Thug.

Policy SP2 Regeneration that works for all makes to mention of how Regeneration that works for all will work for Liverpool Grove Conservation Area. Policy SP2 Regeneration that works

for all is therefore Unsound as it has not been positively prepared, it is not justified, and it is not effective. 1. Aylesbury Area Action Plan Introduction:

"Design excellence will be at the core of the redevelopment and we will emphasise and control design quality at each stage of the project to create a varied and interesting new residential neighbourhood" neighbourhood.

2. Aylesbury Area Action Plan Public Life says: PL1: Street layout. The street layout should accord with the masterplan as shown in Figure 5.

Planners and architects say NO: The street layout directly contradicts the masterplan.

'Independent' DRP says: "we endorse the proposals."

3. Aylesbury Area Action Plan Public Life says: PL2: Design principles.

Development should follow the block layout shown on the masterplan.

Planners and architects say NO: The block layout directly contradicts the masterplan.

'Independent' DRP says: "we endorse the proposals."

4. Southwark Plan policies say: Policy 3.15 – Conservation of the Historic

Environment. Development should preserve or enhance the special interest or historic character or appearance of buildings or areas of historical or architectural significance. Planning proposals that have an adverse effect on the historic environment will not be permitted.

Planners say Nothing, literally: In the Planning Officer's 111 page Report, Aylesbury Road is never once mentioned.

'Independent' DRP says: "we endorse the proposals."

5. Southwark Plan policies say: Policy 3.18 - Setting of Listed Buildings, Conservation Areas and World Heritage Sites

Permission will not be granted for developments that would not preserve or enhance:

iii. The setting of the Conservation Area; or

iv. Views into or out of a Conservation Area.

Planners say Nothing, literally: In the Planning Officer's 111 page Report, Aylesbury Road is never once mentioned.

'Independent' DRP says: "we endorse the proposals."

6. Core Strategy Strategic Policy 12 – Design and conservation says:

Development will achieve the highest possible standards of design of buildings and public places to help create attractive and distinct places. We will do this by expecting development to conserve or enhance the significance of Southwark's heritage assets, their settings and wider historic environment, including conservation areas.

Planners and architects say Nothing, literally: In the Planning Officer's 111 page Report, Aylesbury Road is never once mentioned.

'Independent' DRP says: "we endorse the proposals."

New Southwark Plan Policy P11: Design of places states that "Development must: Ensure height, scale, massing and arrangement respond positively to the existing townscape, character and context; and Ensure the urban grain and site layout take account of and improve existing patterns of development and movement, permeability and street widths."

The current proposals for Aylesbury Plot 18 are in direct conflict with all of the

policies listed, including new Southwark Plan Policy P11: Design of places. Regeneration that works for all is emphatically not working for Liverpool Grove Conservation Area.

Strategic Policy SP2 Regeneration that works for all is therefore Unsound as it has not been positively prepared, it is not justified, and it is not effective. So why would an 'Independent' Design Review Panel endorse proposals which:

1. Directly contradict the words of the AAAP Masterplan: MP1 The masterplan;
2. MP1The masterplan;

Directly contradict the map of the AAAP Masterplan: MP1 The 3. Directly contradict AAAP Public Life PL1: Street layout;

4. Directly contradict AAAP Public Life PL2: Design principles;
5. Directly contradict Core Strategy: Strategic Policy 12 – Design and conservation;

6. Directly contradict Southwark Plan: Policy 3.15 – Conservation Of The Historic Environment;

7. Directly contradict Southwark Plan: Policy 3.18 – Setting Of Listed Buildings, Conservation Areas and World Heritage Sites

Some clues:

1. The owners of all those planning policies?

Council team

Tibbalds Planning and Urban Design.

“Answer: Southwark Council, Planning policy and research team.

2. The applicant for the Aylesbury Regeneration?

Answer: Southwark Council via its Planning office.

- 3 So team’s policies?

Client: London Borough of Southwark

Tibbalds was appointed to provide a bespoke urban design training course for Southwark officers ten years on from a similar course that we devised and led.”

3. the people who were proposing directly contradicting all the Planning policy and research team s Answer: Southwark Council, Planning office.

4. Who was tasked to review and provide advice on the Aylesbury regeneration?

Answer: The 'Independent' Design Review Panel.

5. How did that work?

Answer: There were two Design Review Panel reviews for Aylesbury Plot 18: first one 20th March 2015 with just two Panel members : “In conclusion, the Panel did not comment on the architectural expression or the proposed form of development”; second review 26th August 2015 with just three Panel members: “they endorsed the strategic approach to the site” “In conclusion the Panel broadly endorsed the proposals.” [Extracts from DRP Reports 20 Mar 2015 and 26 Aug 2015]

6. So how ‘Independent’ was the ‘Independent’ Design Review Panel?

Answer: Not remotely ‘Independent’.

7. Why is that?

Answer: Most of the members of the Design Review Panel are architects, and most if not all of those have dealt with Southwark Council’s Planning Office – often multiple times - through planning applications that have been approved for buildings in the Borough.

Answer: One of just two Design Review Panel members (from a panel of 40 or 50) who bothered to show up for the first review of Aylesbury Plot 18, and one of just three for the second review – is a Director of a Planning and Urban Design company called Tibbalds. According to their website – extract here – Tibbalds “was appointed to provide a bespoke urban design training course for Southwark officers ten years on from a similar course that we devised and led.” So Tibbalds were twice paid by Southwark Council to train its planners, and a Director of that company was reviewing the proposals being promoted by the Planning office of the Council that paid her company to train its planners. New Southwark Plan consultation – SP2 Regeneration that works for all 12

9. So the Design Review Panel – meant to be ‘Independent’ - is not really ‘Independent’?

Answer: Not remotely ‘Independent’

Alvey and Kinglake Estates have never been part of the Aylesbury map and seem to be arbitrarily being included now in the plan on the sly for property investment purposes and pure profit making. Both estates are in good repair and support current social housing needs. Impacted Leaseholders and Tenants have not been consulted at all (i found out by accident from someone who spotted the change to page 39 by accident). Neither have either of our established tenants associations been consulted. Showing complete disregard for established communication with the community. Consult with those households potentially impacted. Write to each providing specific details - rather than hiding updates in page 39 of docs. Engage with our established tenants associations. Don't redraw maps purely to support profit making at the cost of social housing.

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

Organisation: Southwark Clinical Commissioning Group  
NSPPSV383

Southwark Clinical Commissioning Group's response to consultation to the New Southwark Plan Proposed Submission version: Amended Policies 2019

Thank you for consulting Southwark CCG on the 2019 amended policies to the New Southwark Plan Proposed Submission version. This response has been prepared by the NHS London Healthy Urban Development Unit on behalf of the CCG following detailed discussions. We very much see this as part of our ongoing engagement between the CCG, other health partners and the Council.

We welcome the amendments to Policy SP2 Regeneration that Works for All which now encompasses promoting wellbeing, investing in prevention and tackling the causes of inequality in addition to creating healthy places and buildings, and opportunities for healthy activities. We ask that the monitoring table in Annexe 6 to the submission version is amended to include specific indicators which will measure progress against this policy, including wellbeing indicators and reduction in inequalities which form wider determinants of poor

Support noted.

<p>physical and mental health.</p>	
<p>Organisation: Southwark Clinical Commissioning Group NSPPSV383</p> <p>Southwark Clinical Commissioning Group's response to consultation to the New Southwark Plan Proposed Submission version: Amended Policies 2019</p> <p>Thank you for consulting Southwark CCG on the 2019 amended policies to the New Southwark Plan Proposed Submission version. This response has been prepared by the NHS London Healthy Urban Development Unit on behalf of the CCG following detailed discussions. We very much see this as part of our ongoing engagement between the CCG, other health partners and the Council.</p> <p>We welcome the amendments to Policy SP2 Regeneration that Works for All which now encompasses promoting wellbeing, investing in prevention and tackling the causes of inequality in addition to creating healthy places and buildings, and opportunities for healthy activities. We ask that the monitoring table in Annexe 6 to the submission version is amended to include specific indicators which will measure progress against this policy, including wellbeing indicators and reduction in inequalities which form wider determinants of poor physical and mental health.</p>	<p>Support noted.</p>
<p>Individual NSPPSV384</p> <p>I believe this plan is unnecessary and does not fit in with the natural harmony of those (people) that have in the area for generations . ....This 'Plan' is absurd , if not , a complete waste of tax payers money . Do not change anything ! Leave things as they are , you will only make things much mich worse .</p>	<p>Support noted.</p>
<p>Individual</p>	<p>Objection noted. Community consultation during the preparation of the</p>

NSPPSV393

The council estates of Kinglake, Alvey and Rodney are not 'brownfield land'. They are structurally sound and healthy communities that have not been consulted about their demolition. The above estates should be balloted about their future.

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

Individual  
NSPPSV396

This is additional to my submission on 17 May, also on behalf of Alvey TRA (ATLA).

We have only recently been made aware of the new consultation regarding the New Southwark Plan and it is not legal to change the consultation in the mid-process and in any case the plan is not legally compliant and is unsound.

Southwark's own guidelines say both:

- (1) The local planning authority must publish the recommendations and the reasons and
- (2) ... must publicise the proposed application in such manner as the person reasonably considers is likely to bring the proposed application to the attention of a majority of the persons who live at, or otherwise occupy, premises in the vicinity of the land.

THIS HAS NOT BEEN DONE.

IT IS NO USE THE COUNCIL CLAIMING THAT WE MAY HAVE BEEN GENERALLY CONSULTED AS PART OF "AYLESBURY PLUS" (THE AREA SURROUNDING

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

The Consultation report for the New Southwark plan is published on the Council's website, showing how the New Southwark Plan and its consultation procedure are legally compliant and sound. All area regeneration plans have been clearly consulted upon, which can be found under the relevant consultation summary of that report. The reasoning for demolition and rebuilding of the estate is justified in the Officer report.

AYLESBURY EST) YEARS AGO BECAUSE WE WERE SPECIFICALLY EXCLUDED FROM THE CONSULTATION PROCESS AND I WAS PERSONALLY REMOVED FROM A MEETING BY A POLICE INSPECTOR EVEN THOUGH PRESENT AS A DULY ELECTED AREA RESIDENTS REPRESENTATIVE.

Then, in any case, there was never any suggestion of extending the Aylesbury area demolition Social-Cleansing zone to nearby estates such and Alvey and Kinglake.

The document is quite distressing and threatening to the physical and mental well-being of any resident in the Aylesbury Area Vision map where on page 39 it states: "...replacing all the existing social rented homes in and in reasonable proximity to the original footprint of the estate".

This is demolition and destruction of one's life framework, being and community and like on the aylesbury where distress led to increasing suicides is a malevolent and deadly attack on tenants and leaseholders on these estates collectively and individually.

We oppose the scheme utterly and totally and demand our estate is not part of the plan. We point out we are NOT part of this scheme until we so agree and this we have not done and never will.

This plan is not sound in that there is no reason or justification to include this statement suggesting the demolition of the adjoining estates of Alvey, Kingslake and Rodney, and this has not been raised with us in consultation.

The plan is not in our interests and since so-called regeneration schemes must be to the benefit of residents it is therefore, again, unsound and illegal.

It is not JUSTIFIED, EFFECTIVE, consistent with NATIONAL POLICY/ LONDON PLAN, or POSITIVELY PREPARED.

Individual

NSPPSV396

The plan refers to alvey and Kinglake and other estates as "brownfield" Land. This perjorative phrase has not been adopted to so apply by any Act of Parliament or any reputable dictionary or normal use where the meaning is vacant or disused Land. The phrase is to give the green light to destruction and social cleansing of our communities and we oppose it absolutely. The plan is ILLEGAL. The whole approach is an anti-democratic attempt at further Landgrab and social cleansing on which we have not been consulted and which is intended to bail- out the failing nhht Aylesbury social cleansing scheme. Your line of questioning to force us to produce Legalistic ammendments in the framework of what is anyway an evil scheme is itself ILLEGAL AND DISCRIMINATES AGAINST OUR COMMUNITY AND ETHNIC MINORITIES IN IT. Our ammendment is delete the whole plan and instead seek consultation from Below as to whether we want to be brownfield thrashed. The answer is NO. You know this anyway which is why you never asked us if we wished to be included in an extended social cleansing plan.

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

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Individual  
NSPPSV398

Leathermarket approves of the changes to SP2 that emphasize addressing inequalities, increasing tenure integration, and ensuring that regeneration benefits everyone who lives and works in the area. The London Bridge and Old Kent Road area visions, in particular, must be made internally consistent with this strategic policy of ensuring that regeneration reduces inequalities. In both of these areas, careful consideration must be given to how planned regeneration will affect the local residents on low incomes and in social housing. The addition of "social regeneration frameworks" and "social regeneration charters and place plans" to SP2 does not effectively demonstrate how communities will be meaningfully consulted, nor how these plans will tackle

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

The Consultation report for the New Southwark plan is published on the Council's website, showing how the New Southwark Plan and its

<p>inequality. The consultation process for social regeneration charters and place plans must be designed to ensure that regeneration schemes tackle, rather than exacerbate, existing inequalities. The changes made to SP2 do not necessarily secure meaningful community engagement on regeneration, particularly in the London Bridge business district and the Old Kent Road Opportunity Area where there is substantial residential accommodation, including social housing. Area visions should be made internally consistent with the aspirations for equality and mixed communities set out in SP2. To make this policy sound, Southwark should also acknowledge the role of community-led approaches to development. To ensure community engagement and empowerment through local development, there should be a requirement that any development of over 100 homes (public or private) includes 10% developed by community-led housing organizations. To ensure that regeneration works for all, consideration should also be given to the employment opportunities created through regeneration schemes. SP2 should outline how local employment opportunities linked to regeneration can be structured to meet the needs of the local community.</p>	<p>consultation procedure are legally compliant and sound. All area regeneration plans have been clearly consulted upon, which can be found under the relevant consultation summary of that report. The reasoning for demolition and rebuilding of the estate is justified in the Officer report.</p> <p>Social regeneration charters are currently in the process of being developed throughout the borough. These will be designated to all of the opportunity areas in the borough and they function to align the communities' priorities and visions for the future of their area and encompass their targets for sustainable development. This will help guide distribution of CIL funds and ensure that allocation of funds is optimum to what has been identified as providing the most benefit to our communities. This aligns the council's desires with our communities' and makes the most of the funds received from developers as part of the regeneration process.</p>
<p>Individual NSPPSV164</p> <p>It is not effective nor consistent with Londonwide policy or the the borough's Local Implementation Plan 3, regarding the importance of healthy streets and the reduction of motor traffic as critical enablers of sustainability and good growth. In particular it is not only tenure types that need greater integration but also the public realm, whether in private or social housing, in order to ensure full permeability for walking and cycling and consistent management of parking spaces across the whole borough. A new paragraph is needed to include healthy streets and motor traffic reduction as key elements of regeneration.</p>	<p>Healthy Streets and Motor Traffic are described in SP5. All development proposals are assessed in the context of London Plan, TfL/DfT Transport Assessment/Travel Plan guidance and NSP.</p>
<p>Organisation: Southwark General Tenants Organisation (SGTO) NSPPSV400</p>	<p>The Southwark Play Strategy identifies the strategic allocation of play space across the borough and ensuring appropriate access to this space is</p>

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

We would like to speak at the examination in public on the below points. I am submitting our NSP response via email in the interest of transparency as a member organisation.

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

1. a) If part of building more homes is to build on top of existing play space and community gardens such as the consultation for the Bells Gardens balls game court suggests, this will harm and reduce existing residents' access to open, green and play space, in areas where there is already a high demand for such areas. Reducing this space will not promote well being and increase inequalities by reducing residents' access to such space.

Green and open spaces should be used as the estate tenants and residents wishes them to be used. Community food projects and play spaces on estates should fit in with Southwark Councils best start in life policy (NSP SP3) including the opportunity for young people to have safe, stable and healthy environment where they feel in control. Pollution levels on these green spaces should also be considered. Estate green and open spaces are communal areas of the estate and therefore should not be promoted as common and public land for open use. There should be additional support available for people in "areas of opportunity" who may have communal green spaces in areas of high night time activity which could bring antisocial behaviour from party goers to the areas of opportunity.

b) Developing spaces which everyone can benefit from can mean communities loose a sense of belonging as estate spaces may become access to anyone.

Many of Southwark Estates which include green areas may be in opportunity

provided for all. There are different types of Play and Community Spaces to meet different age groups and needs, the specifics of which are monitored by the Council's Leisure, Sport and Recreation team rather than Planning Policy. Pollution levels are considered under P66: Improving Air Quality. P55 Designing Out Crime ensures that developments are designed in such a way to minimise antisocial behaviour.

Point b suggests exclusionary access to open spaces which cannot be enforced; however different play spaces should attract interactions from different community groups therefore not necessarily appealing to everyone by design. Behaviour on estates which this comment refers to is monitored by a separate group and is not accounted by Planning Policy.

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

areas which may involve late night licences meaning people using estate greens at unsociable hours. This potentially could create unsociable behaviour on estates and residents on estates feeling like they have no ownership of their community spaces.

Case study given by a Nelson Square tenant:

Nelson Square, SE1, an estate within a newly popular area had been petitioning from some time to have gates on its estate following an influx of party goers. The estate green space was even advertised as a place to hang out on Time Out magazine. It was left to the estate to petition to have gates installed. More information found here: <http://www.nelsonsquare.org/gates-for-nelson-square/>.

Safety measures should not be at the cost of leaseholders on the estates, no activity should cause installation of things like entry door systems or fencing off of estates at an additional cost to leaseholders due to them being in areas of opportunity or sudden increase in surrounding population. Any additional safety measures that tenant or residents can demonstrate as needed should not be at the cost of leaseholders but should be the councils responsibility.

3. a) Emphasis on tenure integration distracts from the main cause of inequality in borough - lack of supply of council housing  
b) Low equity of esteem from street level is caused by Southwark Council's inability as a landlord to adequately maintain their estates. Stark visible difference and tenure segregation can only be resolved through investment in existing housing stock.

6. Southwark's ambitious housing targets require much more health related infrastructure especially as a majority of those on the council waiting list have expressed a health condition within their household. SP2 should include a separate point that addresses health need, separate from local distinctiveness and heritage-led regeneration.

7. Poor housing provision is a key contribution to inequality, such as overcrowding. Southwark should provide more new and invest in its existing council homes.

Under the reasons in SP2 it refers to charters and place plans but it does not provide information on what these documents are, how they work or how they

will be developed.

Individual  
NSPPSV148

It fails the test of soundness by not being a clear, transparent policy. New concepts are introduced by the revisions – regeneration for all, good growth, social regeneration framework, social regeneration charters and place plans – with no guidance on what they mean.

Since the charters and place plans are important delivery mechanisms they should be included in the policy, not under “Reasons”. The policy is clearly targeted at ensuring regeneration works for existing residents. Further the preamble to SP2 and point 7 say the stated aim is to reduce inequalities and strengthen support for those who are vulnerable or who face greater disadvantage.

However, what we are finding in practice is the Council inviting consortia of developers to write the charters. The Business Improvement District at St Thomas Street, Housing Associations for the Walworth charter, the same who are demolishing and replacing the Aylesbury estate.

It is difficult to understand how a charter produced by a developer with minimal inputs from the local community can be anything other than business as usual thus continuing the trajectory of increased inequality.

The policy is also unsound in that it fails to look at the specific needs of the 9 protected groups under the Public Sector Equality Duty (Equality Act 2010) nor does it give guidance on how these needs can be met in order to remedy the disproportionate negative impact of regeneration that we see happening across Southwark

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

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

I have studied the Equalities Impact Assessment (EqIA), the supporting document for the amended policies, and for each of the 9 protected groups it repeats the same assertions:

“SP2 illustrates positive impacts as it aims to provide and improve, infrastructure to revitalise neighbourhoods for all ages and will enhance the overall wellbeing of residents of Southwark”

“SP2 will encourage better health and life chances for all in regards to physical and mental health.”

There is no specificity and there has been no consultation with equality groups.

Whilst it is positive that Southwark Council recognises socio-economic disadvantage within its EqIA which, says the Council, continues to be a major cause of inequality in the borough, the good work is undermined by the EqIA finding exactly the same impact and the same wording to describe it as above.

To make this policy sound, the following changes are required:-

- The social regeneration charters and place plans must be part of the policy. This is absolutely crucial because there are no relevant and appropriate development management policies to implement regeneration for all.
- The charters should be prepared by the Council working collaboratively with community groups and voluntary sector organisations to set out community needs and provide a baseline audit of social infrastructure and social capital. Developers will then work together with local community groups to deliver the charters by the making of place plans.
- There should be DM policies on play space and social infrastructure. Regenerated neighbourhoods must be healthy and inclusive places with community spaces and other amenities that are affordable and accessible to

everyone

- An SPD is needed “Regeneration that works for all” to give guidance on the issues and remedies specific to each of the 9 protected groups and also low income households (socio-economic disadvantage)
- There must be monitoring indicators to review the operation of SP2.
- Regeneration that works for all needs to be defined, ensuring explicitly that the most vulnerable groups such as migrants and rough sleepers are included.
- Good growth needs to be defined and we suggest this addresses social justice, economic exclusion and poverty. This could embrace the UN Sustainable Development Goals in particular 1-3, 10 and 11 of the goals which are all applicable to the Good Growth and refer to the need for an integrated functioning of cities and their inhabitants with policies which promote and foster health and well being, social and economic integration and healthy living environments.
- One way to give everyone the opportunity to participate is through neighbourhood planning. However, the New Southwark Plan gives little or no recognition to neighbourhood planning and has placed a bar to neighbourhood planning in regeneration areas. E.g. Old Kent Road and St Thomas Street. Positive support for neighbourhood planning should be included in the policy.

Individual  
NSPPSV402

No further comment applied.

Comment noted.

Individual  
NSPPSV409

I would like the opportunity to to speak at the Examination in Public SP2: Regeneration that works for all. While it sounds positive, this policy is not justified or effective because of poor evidence, lack of community consultation and fundamental undeliverability, both in itself and in relation to other parts of the NSP - including the policies on Tall Buildings (P14) and Local List (P70) for example.

For SP2 point 5 (on collaboration) or point 6 (on heritage) to be sound, they would need to be developed to be less vague through genuine community consultation with examples of potential positive tools for practical implementation explored and then given mention - like community led design review panels for example. Direct links should also then be made to policies like P14 and P70 - the evidence bases for which need considerable work themselves.

Current planning activity on St Thomas Street - where major high-rise planning applications are being granted directly against local opinion and ahead of the promised 'charters / place plans' - is an example of how much work needs to be done before the local plan is sound. If this does not happen, the unique historic qualities of this local environment will very soon be irretrievably lost and with them the distinct sense of place they afford.

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

Individual  
NSPPSV410

No further comment applied

Comment noted.

Individual  
NSPPSV62

The aims of policy SP2

Social regeneration charters are currently in the process of being developed throughout the borough. These will be designated to all of the opportunity areas in the borough and they function to align the

- While it was a welcome move to bring social elements into the regeneration of land and buildings just attaching it to the planning policies grouped in SP2 about revitalising neighbourhoods there was little to show how this would make a real difference to the destructive impact of regeneration on current residents, businesses and communities. It should be attached to all the policies to be sound. It is not positively prepared.
- The social regeneration needs to ensure that the redevelopment and development is sustainable; in terms of environmental, social, and whole life economic and financial measures.
- The impact on existing communities should be assessed. The approach used by developers in preparing documents for planning applications is not adequate to understand the community level impact, the wider context and cumulative impact of multiple developments eg Burgess Business Park and Old Kent Road.
- It is not clear from the policy what changes the council would expect to see of how a developer and/or a development would undertake activity to deliver on the policy.
- It is apparent that development has negative as well as positive impacts. Shops and businesses close or are removed due to higher rents. Communities are displaced.

#### The mechanisms for charters

- The new proposed 'social regeneration' charters for different areas in the borough rely on "working in partnership with existing local residents and businesses". This is welcome but the current practises in community engagement in planning and regeneration fall very short of real partnership. They remain an aspiration and not a justified and effective policy.
- This strategic policy SP2 needs to apply to all areas of the borough. Its implementation appears to be related only to areas that will have a social regeneration charter and place plans so is not a comprehensive policy for all areas, and does not meet the requirement to be regeneration that works for all, and so not positively prepared. Burgess Park is an example of an area surrounded by development but with no area plan.

communities' priorities and visions for the future of their area and encompass their targets for sustainable development. This will help guide distribution of CIL funds and ensure that allocation of funds is optimum to what has been identified as providing the most benefit to our communities. This aligns the council's desires with our communities' and makes the most of the funds received from developers as part of the regeneration process.

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

- The initial plans to develop development charters is welcome and the council needs to move swiftly to make the information on-line more easily accessible as well as reaching out to communities and residents less likely to be engaged with the council. For example the number of documents on the planning application are badly labelled and no easy-read summary is available.
- A major issue with regeneration is that it has not served existing communities, and is still not serving them. As soon as a regeneration area is declared the land values increase and local businesses and start up enterprises are squeezed out by rising rents and pressures of landowners to sell, and local residents are also squeezed out by rising rents and rising house prices. So aspiring to 'regeneration that works for all' is not going to be achieved by having social regeneration charters and place plans without a really different way of approaching regeneration and development.
- It is essential for this that no regeneration or redevelopment plan begins for an area without a requirement that there is a 'facts on the ground' audit compiled by the developers with the collaboration of ALL stakeholders in the site, and the report subject to consultation with all those stakeholders. The implied assumption that so much of the borough needs regeneration characterised by redevelopment is not supported by the facts.
- The impact on local business; the loss of local valued services: Whitton Timber, B&Q. A reduction in certain types of jobs. The observational evidence is that regeneration does not benefit existing residents and local businesses that are squeezed out by the effect on land values and demolitions.

#### Health and well-being

- There is also evidence that continuing disturbance in environments has adverse effects on the health and well being of people affected. These come from a range of factors such as the anxiety and stress from the uncertainties imposed on people's lives to the disturbances though upheaval or constructions processes. The more regeneration based on redevelopment there is the more likely there will be harmful effects on the existing residents and businesses. Clearly it will not be benefitting all.
- The policy states that "wellbeing becomes the most important outcome of

our regeneration” this is justified, but not effective as the policy is not explicit enough about how this will be achieved. This could be achieved by requiring high quality green space (not hard landscaping and public thoroughfares) especially in areas of tall buildings which mitigate areas of the borough with a deficit. – This must be improved wellbeing for groups who need additional assistance – it cannot mean that those who already have high levels of well-being gain further advantages. This would be in line with Mayor of London’s draft London Plan and Good Growth strategies.

- Equally the planning policy could benefit mental health and well-being by restricting tall buildings. There is evidence they are not beneficial for health and well being and will have a negative impact on resident and the wider community. (The consequences of high-rise living, R Gifford) and have a negative impact on community inter-action, sense of security and sense of well being (Ground Control, A Minton).

- Improved sustainability, environmental standards, reduced use of energy and water, less demolition before the end of a buildings life and ensuring buildings meet the highest environmental standards will all contribute to health and well-being. Achieving density can be achieved in a number of ways and is not reliant on tall buildings.

Cities have done a poor job in adding density in a gentler, kinder way that has fewer consequences to their existing character and existing populations, which are the reasons why people are moving there in the first place. Revised wording

Developing places where everyone can benefit from all of the activities such as play spaces, leisure activities, squares and shops, buildings, green spaces and the environment.

Enhancing local distinctiveness and heritage-led regeneration by requiring the highest possible standards of design, creating vibrant, attractive, healthy, safe and distinctive buildings and places that install pride of place in all our communities. This will include green infrastructure and opportunities for healthy activities and improving streets, squares, parks, green spaces and public places between buildings;

<p>We need to make sure that as this change is taking place, we work in partnership with existing local residents and businesses and that they are listened to at all times through every stage of the planning and development process.</p>	
<p>Individual NSPPSV414</p> <p>MoS supports the refocus of Policy SP2 to embrace the wider benefits of regeneration for the whole community. MoS believes that the provision of affordable and flexible workspace will be an important part of the Borough's regeneration. As currently drafted, Policy SP2 does not specifically refer to affordable and flexible workspace.</p>	<p>Support noted. Businesses and workspaces have been included in the amended wording of SP2.</p>
<p>Individual NSPPSV415</p> <p>We need to stop development of buildings that are over 7 stories tall to stop Southwark from becoming a wind tunnel with no light and no street level community. Limit future developments to be no higher than what they replace.</p>	<p>P14 is considered compliant with the Mayor's adopted London Plan (2016) and the emerging draft New London Plan, as the workings of our plan-led approach is set out in the emerging Tall buildings background and research paper with an urban context evaluation section mapping out constraints within the Borough. Further to this specific site allocations have been identified to anticipate tall building development within the guidance section to ensure that there is a clear plan-led approach to constructing tall buildings. The background and research paper also discusses how 'appropriate, sensitive and in appropriate locations' have been identified. The detail of heights however shall not be covered in the NSP as it is a strategic policy document, but rather in the AAP or SPD associated to the area vision of the site allocation.</p>
<p>Individual NSPPSV416</p> <p>The New Southwark Plan Submission Version - Amended Policies document</p>	<p>The sustainability of the new Southwark Plan is addressed through our Integrated Impact Assessment. Each of our strategic policies tackles all aspects of sustainability from social, environmental and economic sustainability lenses. The IIA ensures that all of our NSP policies are</p>

includes a number of changes to policies since the version consulted on in 2017-18. However it fails to consider the major change in the overall context for planning, which is the climate emergency facing Southwark, London and the world. This climate emergency was recognised at a council assembly on 27 March, when Southwark councillors unanimously passed a motion to declare a climate emergency and make the borough carbon neutral by 2030 – bringing the previous target date forward by 20 years.

Southwark Green Party objects to the NSP Submission Version Amended Policies document, which is unsound across all sections for the following reasons:

- It is not positively prepared – by failing to explicitly recognise and describe the sources of climate emissions in the borough and outline a strategy for addressing them, the Plan makes no contribution to tackling the declared climate emergency and is not consistent with achieving sustainable development;
- It is not justified because without an explicit process of assessing the proposed amendments against the targets for reducing greenhouse gas emissions (which has not happened) it is impossible to say whether the revised policies represent appropriate and proportionate strategies, compared with reasonable alternatives;
- It will not be effective in delivering CO2 reductions within the period proposed (by 2030) because it does not set out measurable steps for achieving these reductions, it just proposes continuing with the Council's current policies. It is unclear what joint working on cross-boundary strategic priorities the Council is proposing: current cross-working on transport priorities is poor, with little evidence that there is coordination between Southwark Council and London Transport on basic issues such as bus services;

Southwark Green Party believes that the council assembly's declaration represents a material change to the terms of reference on which the New Southwark Plan is based, meaning that it now demands comprehensive revision. The NSP Proposed Submission Version Amended Policies document

adequately aligned to the Planning and Compulsory Purchase Act 2004 regulations, a Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA), prepared in accordance with the Strategic Environmental Assessment Directive EC/2001/42 is required for all Development Plan Documents.

contains no reference to climate change; while it includes repeated mention of economic growth in the form of new jobs and businesses it does not address how this growth will be managed sustainably, other than in general terms. There is no strategy for encouraging green growth, so it must be assumed that any economic growth will continue the current model of carbon-intensive economic activities. All sections of the New Southwark Plan Submission Version - Amended Policies document must state clearly how the council and its partner organisations intend to achieve net zero greenhouse gas emissions within the next 12 years in the key areas of housing, transport and waste recycling, including interim targets and reporting, and improved community engagement and cross-departmental working. The effects of climate change are already evident in our cities, causing heatwaves, more frequent storms and increased flood risk, and the revised plan must improve significantly on the Proposed Submission Version, specifically the Amended Policies document, by setting out detailed and proactive measures for addressing these challenges.

Organisation: Vital OKR  
NSPPSV205

We object to wording that states and / or implies bias in favour of residents over others, such as businesses and civic organisations operating in the borough. Planning must consider and balance a broad range of requirements with a spirit of fairness, regardless of the peculiarities of enfranchisement. To correct the bias in SP2 (and to correct some vague wording and a few errors) we suggest the following amendments:

Amend first sentence to read: 'We will continue to revitalise our places and neighbourhoods localities to create new opportunities for residents, promote wellbeing, reduce inequalities, and sustain the conditions for a flourishing and diverse economy, so that people have better lives in stronger communities...'

Amend 1. to read: 'Developing Shaping places where everyone can benefit from all of the spaces and activities of a flourishing and welcoming city with a

Support noted. Businesses and workspaces have been included in the amended wording of SP2.

good environment. such as play spaces, leisure activities, squares and shops, buildings and environment. These places should enable everyone to feel proud of their home and / or place of work, and create a sense of belonging in the community;

Amend 2. to read: 'Investing in our communities and residents, and particularly existing residents, businesses and civic organisations, so that all everyone can access the benefits of our regeneration programmes and the opportunities created by these programmes for new homes, new jobs, education, training and new infrastructure;'

Amend 5. to read: 'Ensuring that our existing residents and businesses and neighbourhoods prosper from good growth by giving people...'

Correct 6. instil rather than install.

Amend Reasons, 4th sentence to read: 'Using our unique location in inner central London to benefit local residents, businesses and civic organisations, it will encourage innovative development of spaces to provide new council and other affordable homes, jobs, schools, shops and places to work for enterprise to flourish.'

Amend Reasons, 6th sentence to read: '...to make them function effectively, and ensure hat they can sustain a diverse economic and civic life.'

Individual  
NSPPSV210

No further comment applied

Support noted.