



New Southwark Plan
Statement of Conformity
June 2020

1. This statement sets out the conformity of the New Southwark Plan (NSP) with the National Planning Policy Framework (NPPF 2019), the adopted London Plan (2016) and the emerging draft New London Plan. It looks at national and regional policies and strategies and highlights the key areas relating to policies in the New Southwark Plan. Elements of each policy have been considered in the relevant sections below.
2. The New Southwark Plan is consistent with national policies and guidance as well as being in general conformity with regional policies as supported by representations received by the Greater London Authority on 20 May 2019 and 9 March 2018. Representations were also received by Transport for London. This has also been demonstrated through a Statement of Common Ground that was prepared jointly between Southwark Council and the Mayor of London as well as with Transport for London.
3. Given the advanced stage of the New London Plan, this is considered to be the most relevant regional planning document. This is supported by the GLA website which states:

‘The Plan is at an advanced stage. Policies contained in the Intend to Publish (ItP) London Plan published in December 2019 that are not subject to a direction by the Secretary of State carry significant weight.’¹
4. Any minor deviation from national or regional policy in response to a local need is strongly supported by a robust evidence base. The NSP is accompanied by a strong evidence base which includes background papers that provide a full policy analysis on relevant policies.
5. **Appendix A** sets out a legal compliance checklist setting out the compliance of the NSP with the Planning and Compulsory Purchase Act 2004 (as amended), the Town and Country Planning (Local Planning) (England) Regulations 2012, the National Planning Policy Framework 2019 and the National Planning Practice Guidance: Plan-making 2019.

SP1 Quality affordable homes

6. SP1 and policies set out under SP1 (P1 – P11) are consistent with the NPPF and in general conformity the London Plan and the emerging New London Plan as set out below.
7. Policies under SP1 include:
 - P1 Social rented and intermediate housing
 - P2 New family homes
 - P3 Protection of existing homes
 - P4 Private rented homes
 - P5 Student homes

¹ <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/what-new-london-plan>

- P6 Housing for older people
- P7 Wheelchair accessible and adaptable housing
- P8 Houses in multiple occupation
- P9 Supported housing and hostels
- P10 Self and custom build
- P11 Homes for Travellers and Gypsies

National Planning Policy Framework February 2019 (NPPF)

8. Chapter 5 of the NPPF refers to delivering a sufficient supply of homes. It seeks to increase the supply of homes through setting requirements for making strategic policies and decision making. This objective is achieved through SP1 with an evidence base to support the strategy.
9. Paragraph 60 confirms that strategic policies should be informed by a local housing need assessment, using the standard guidance in the national planning policy guidance. This is achieved through a robust evidence base which includes the Strategic Housing Market Needs Assessment 2019, Southwark's Housing Strategy 2015, the 5 and 15 year land supply 2019 and the Housing Delivery Test Action Plan 2019.
10. Paragraph 61 sets out that the *size, type and tenure of housing needed for different groups should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes*. Policies under SP1 address need in relation to specialist housing.
11. With regards to affordable housing, paragraph 62 sets out that planning policies should specify the type of affordable housing need and expect it to be met on-site, unless off-site provision or an appropriate financial contribution in lieu can be robustly justified; and the agreed approach contributes to the objective of creating mixed and balanced communities. P1 of the NSP achieves this aim.
12. Paragraph 64 sets out that major developments proposing housing should expect at least 10% of homes to be affordable home ownership. Exceptions to the 10% requirement are: solely build to rent homes; specialist accommodation for groups with specific needs; self-build homes and provision of only affordable housing schemes. The NSP's affordable housing requirements set out a requirement for a minimum of 10% affordable housing to be intermediate (P1) in response to local circumstances and supported by a strong evidence base.
13. Paragraph 65 requires strategic policy-making authorities (this includes the Greater London Authority) to establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need can be met over the plan period. The housing background paper, the 5 and 15

year housing land supply, the Strategic Housing Market Assessment and the emerging new London Plan have supported this objective.

14. The NSP is also in conformity with the NPPF (paragraphs 67-70) in relation to land availability and small and medium sites. This is demonstrated through the housing background paper and 5 and 15 year housing land supply.
15. Paragraph 73 of the NPPF sets out how local authorities are to demonstrate the expected rate of housing delivery over the plan period, considering whether it is appropriate to set out the anticipated rate of development for specific sites. This has been assessed in the 5 and 15 year housing land supply for the New Southwark Plan. A Housing Trajectory has been included within the Plan which provides an overview of the 5 and 15 year housing land supply.

London Plan March 2016

16. The London Plan (2016) sets a target of 27,362 new homes between 2015 and 2025 (in table 3.1); there are enough sites in Southwark to build 2,736 new homes per year in this period. These targets are informed by the need for housing as evidenced by the Greater London Authority's 2013 Strategic Housing Market Assessment and London's housing land capacity as identified through its 2013 Strategic Housing Land Availability Assessment.
17. The NSP is also compliant with the London Plan's requirement to achieve a choice of affordable homes as well as specialist homes. The 5 and 15 Year Housing Land Supply Report demonstrates that the housing target set in the adopted London Plan can be met.

New London Plan

18. The Inspector's Report for the New London Plan sets a 10 year housing target of 23,550 homes (2019/20-2028/29) for Southwark. Within the site allocations within the New Southwark Plan we require the provision for enough homes on sites that 'must' provide housing to meet this target. The 5 and 15 Year Housing Land Supply Report sets out that we can meet our housing target, this sets out the sites where we anticipate delivery and the phasing of delivery.
19. We are committed to delivering new homes and achieving 50% social rented and intermediate homes which is in accordance with the emerging New London Plan. Policy SP1 sets out how we aim to achieve this.

SP2 Regeneration that works for all

20. SP2 and policies set out under SP2 (P12 – P25) are consistent with the NPPF and in general conformity with the London Plan and emerging New London Plan as set out below.

- Policies under SP2 include:
- P12 Design of places
- P13 Design quality
- P14 Residential design
- P15 Designing out crime
- P16 Tall buildings
- P17 Efficient use of land
- P18 Listed buildings and structures
- P19 Conservation areas
- P20 Conservation of the historic environment and natural heritage
- P21 Borough views
- P22 Archaeology
- P23 World heritage sites
- P24 River Thames
- P25 Local list

National Planning Policy Framework 2019

21. SP2 achieves the objectives set out in Chapter 12 Achieving well designed places. Chapter 12 states that achieving well-design places and creating high quality buildings is fundamental to the planning and development process. Good design is a key aspect of sustainable development, and this should be achieved by setting clear design expectations.
22. SP2, and in particular P14 and P17, achieve the objectives set out under Chapter 11 Make efficient use of land by planning for higher densities using a design led approach. Chapter 11 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. This can be achieved through higher density, mixed use development and the use of previously developed land alongside the back of buildings, to achieve the housing targets the Government has set and this is achieved through the tall buildings policy P14.
23. SP2 is also compliant with Chapter 16 Conserving and enhancing the historic environment. Chapter 16 states that "Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:
 - the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
 - the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
 - the desirability of new development making a positive contribution to local character and distinctiveness; and

- opportunities to draw on the contribution made by the historic environment to the character of a place
24. SP2 and the policies under SP2 support this objective with a number of policies relating to the enhancement of the historic environment.

London Plan 2016

25. In the adopted London Plan Policy 3.4 (Optimising Housing Potential) is aimed to ensure that development optimises housing output for different types of locations in London and has an associated sustainable residential quality (SRQ) density matrix, London Plan Table 3.2, which sets ranges for appropriate residential density in different urban character settings and with different levels of public transport accessibility. As the New London Plan is at an advanced stage, SP2 follows the approach of the New London Plan 2019 in relation to making efficient use of land.

New London Plan

26. The emerging New London Plan 2019 has removed the density matrix in favour of a design led approach which optimises site capacity. The NSP has followed this approach and is in conformity with the new London Plan as evidenced in the GLA's representation dated 20 May 2019.
27. The NSP is also compliant with design policies set out in the London and the objective to enhance the historic environment.

SP3 Best start in life

28. SP3 and policies set out under SP3 (P26 – P27) are consistent with the NPPF and in general conformity with the London and emerging New London Plan as set out below.
29. Policies under SP3 include:
- P26 Education places
 - P27 Access to employment and training

National Planning Policy Framework 2019

30. SP3 supports the overall aim of the NPPF to provide appropriate and suitable infrastructure including the provision of educational facilities. With regards to the provision of educational infrastructure, paragraph 94 states that it is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. SP3 is supported by an evidence base which includes the need for school places. The evidence base also includes the Infrastructure Background Paper and a

viability background paper which considers the policy requirements as well as the s106 and CIL SPD requirements that will inform the provision of social infrastructure.

31. National Planning Practice Guidance - Healthy and safe communities 2014 Paragraph 8 states that plans should seek to meet the development needs of their area, including community facilities such as schools, and should allocate sufficient suitable land for schools to meet the need anticipated over the plan period, taking into account needs that may cross local authority boundaries. The location of the school is addressed through Area Action Plans and site allocations throughout the New Southwark Plan.

London Plan 2016

32. Policy 3.16 sets out that development must provide high quality social infrastructure, which will be supported in light of local and strategic social infrastructure needs assessments. The policy suggests that proposals for development where existing social infrastructure will be lost without realistic proposals for re-provision should be resisted, and that facilities should be accessible to all sections of the community, (including disabled and older people) and be located within easy reach by walking, cycling and public transport.
33. Policy 3.18 sets out that the Mayor will support provision of childcare, primary and secondary schools, and further and higher education facilities adequate to meet the demands of a growing and changing population and to enable greater educational choice.
34. SP3 is in conformity with these policies and the London Plan's requirements to provide social infrastructure.

New London Plan

35. Policy S3 states that to ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice, boroughs should prepare Development Plans that are informed by a needs assessment of education and childcare facility needs. As part of this process, sites must be identified for future provision. This is achieved through SP3 and supported by site allocations and Area Action Plans.

SP4 Strong local economy

36. SP4 and policies set out under SP3 (P28 – P43) are consistent with the NPPF and in general conformity with the London Plan and emerging New London Plan as set out below.
37. Policies under SP4 include:
- P28 Strategic protected industrial land

- P29 Office and business development
- P30 Affordable workspace
- P31 Small shops
- P32 Business relocation
- P33 Railway arches
- P34 Town and local centres
- P35 Development outside town centres
- P36 Protected shopping frontages
- P37 Shops outside protected shopping frontages, town and local centres
- P38 Shop fronts
- P39 Betting shops, pawnbrokers and pay day loan shops
- P40 Hotels and other visitor accommodation
- P41 Pubs
- P42 Outdoor advertisements and signage
- P43 Broadband and digital infrastructure

National Planning Policy Framework 2019

38. The NPPF sets out planning policies related to four distinct areas relating to Southwark's economy:

- Chapter 6 Building a Strong Economy
- Chapter 7 Ensuring the vitality of town centres
- Chapter 10 Supporting high quality communications
- Chapter 11 Making Effective use of land

39. The Offices, Hotels, Retail and Industrial Land Background Papers sets out the conformity of SP4 and the policies under SP4 with the NPPF. This is also set out in more detail in the table below.

London Plan 2016

40. The London Plan sets out to meet two key challenges which are to make London:

- A city that meets the challenges of economic and population growth and;
- An internationally competitive and successful city

41. In terms of developing London's economy, the Mayor will promote a diverse economy supported by a diverse size and type of office space and maximise benefits from new infrastructure to support sustainable growth. Paragraph 4.4 (p143) states that the plan "aims to ensure that London continues to excel as a world capital for business, while also supporting the success of local economies and neighbourhoods in all parts of the capital".

42. The Mayor supports the management and mixed used development and redevelopment of offices to improve London's competitiveness. The Mayor also recognises that strategic and local differences should dictate a borough's needs and focus for offices. Local plans should encourage the conversion of

surplus offices to other uses and promote mixed use development which is informed by local studies of office demand. For example, the CAZ remains an area of high office demand and due to environmental and transport improvements, will continue to attract businesses globally (p149). The Offices background paper sets out SP4's conformity with the London Plan in relation to office and employment provision.

43. The Mayor will adopt an approach to industrial land which ensures a sufficient stock of land and premises to meet the needs of future industry throughout London. LDFs should protect locally significant sites and manage industrial land and sites where justified by evidence. The Industrial Land background paper sets out in full the conformity of SP4's approach to industrial land.
44. The London Plan supports a competitive and diverse retail sector and promotes sustainable access to good and services required by Londoners. LDFs should support the convenience of retail particularly in local centres. LDFs should provide a policy framework for maintaining, managing and enhancing local and neighbourhood shopping and facilities for goods and services.
45. The Mayor encourages the imposition of conditions to large scale retail developments as a means of seeking contributions through planning to support small and affordable shops. LDFs should support the provision of small shop units. Policies relating to retail under SP4 are consistent with this vision. The Retail background paper sets out in full the conformity of SP4's approach to retail.
46. Policy 2.11 in the London Plan and supported by the CAZ SPG (2016) sets out the strategic functions of the CAZ which seek to achieve a balance of uses in the internationally significant centre of London. Policies relating to SP4 and hotel provision support this policy as set out in the Hotels Background Paper.
47. SP4 is in accordance with the adopted London Plan as set out in relevant background papers and supported by a robust local evidence base.

New London Plan

48. The draft New London Plan defines the strategic approach for town centre development, designation and implementation, in particular, how the vitality and viability of London's varied town centres should be promoted and enhanced. The draft New London Plan places significant emphasis on good growth as inclusive growth, a successful, competitive and diverse retail sector. This is reflected in SP4 and the policies under SP4.
49. This includes the principles of co-location, substitution and intensification including the potential for a local plan-led process of consolidation of industrial land and mixed use development of purpose built industrial workspaces alongside new homes. Policies have shifted to seek to retain more industrial

- capacity than previous iterations of the plan and seek to achieve an overall net loss of industrial capacity across London as a general principle.
50. This is detailed further in the Industrial Land Background Paper, with Southwark's approach supported by a robust evidence base.
51. Chapter 6, 'Economy', sets out the importance of strategic activities and land uses (for example offices and other commercial, cultural and leisure uses) or erode the mixed-use character of an area should be avoided.
52. Policy E1 Offices details the need for improvements to the competitiveness and quality of office space of different sizes, which should be supported by new office provision, refurbishment and mixed-use development. The increase in office stock is supported in areas where there is detailed evidence of for office-based employment and floorspace.
53. The above points relating to office development is supported throughout the NSP with site allocations requiring a significant uplift in employment floorspace. This approach is detailed in the Offices Background Paper and supported by strong local evidence.
54. Policy SD4 in the draft New London Plan states development plans should set out the appropriate balance between the various CAZ strategic functions in different parts of the CAZ having regard to local circumstances (2.4.4A). These policies seek to achieve the important role of the character and function of the CAZ as a vibrant mixed use area, ensuring activity and vitality at different times of the day and week. This policy is supported by the Hotels Background Paper and the policies under SP4 which aim to achieve a balance of uses in the CAZ.
55. The London Plan and draft New London Plan define the strategic approach for town centre development, designation and implementation, in particular, how the vitality and viability of London's varied town centres should be promoted and enhanced. The draft New London Plan places significant emphasis on good growth as inclusive growth, a successful, competitive and diverse retail sector. This is highlighted in the Retail Background Paper and is delivered through policies relating to retail and town centre uses.

SP5 Healthy, active lives

56. SP5 and policies set out under SP5 (P44 – P54) are consistent with the NPPF and in general conformity with the London Plan and the emerging New London Plan as set out below.
57. Policies under SP5 include:
- P44 Healthy developments
 - P45 Leisure, arts and culture
 - P46 Community uses
 - P47 Hot food takeaways

- P48 Public transport
- P49 Highways impacts
- P50 Walking
- P52 Low Line routes
- P52 Cycling
- P53 Car Parking
- P54 Parking standards for disabled people and the mobility impaired

National Planning Policy Framework 2019

58. Paragraph 8b suggests that health, social and cultural well-being are identified under the social objective of the NPPF 2019. Intentioned to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.
59. Paragraph 91 states that policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
60. SP5 supports this objective by setting out policies that promote healthy streets and active design to support our aim to build resilient communities and an age friendly borough.

London Plan 2016

61. SP5 is in conformity with the London Plan objective to improve the health of Londoners. Paragraph 1.49 notes that "economic success; making the kind of step change needed in environmental issues; and improving the health, wealth and quality of life of Londoners are all inextricably linked."
62. Chapter 3 of the London Plan sets out a vision that supports a good and improving quality of life through the provision of opportunities, homes and social infrastructure. SP5 supports this objective through policies that aim to create healthy places through design led places, sustainable transport and the provision of suitable community spaces.
63. SP5 also supports the objectives of Chapter 6 of the London Plan to provide a transport system that where it is easy, safe and convenient for everyone to access jobs.

New London Plan

64. The overall aim of the New London Plan 2019 is to achieve Good Growth. This is supported by six Good Growth Policies which includes:
- Policy GG1 Building strong and inclusive communities
 - Policy GG2 Making the best use of land
 - Policy GG3 Creating a healthy city
 - Policy GG4 Delivering the homes Londoners need
 - Policy GG5 Growing a good economy
 - Policy GG6 Increasing efficiency and resilience
65. SP5 works to achieve Good Growth as the strategic target of the London Plan, in particular support of GG3 to improve Londoners' health and reduce health inequalities.
66. SP5 also supports the New London Plan's aim to develop London's social infrastructure through policy S1. This is achieved through the policies under SP5 and supported by site allocations and Area Action Plans.
67. The NSP also works towards the New London Plan's objective for a strategic approach to transport (Policy T1) and promotes sustainable methods of transportation.

SP6 Cleaner, greener, safer

68. SP6 and policies set out under SP6 (P55 – P69) are consistent with the NPPF and in general conformity with the London Plan and the emerging New London Plan as set out below.
69. Policies under SP6 include:
- P55 Protection of amenity
 - P56 Open space
 - P57 Open water space
 - P58 Green infrastructure
 - P59 Biodiversity
 - P60 Trees
 - P61 Reducing waste
 - P62 Land for waste management
 - P63 Contaminated land and hazardous substances
 - P64 Improving air quality
 - P65 Reducing noise pollution and enhancing soundscapes
 - P66 Reducing water use
 - P67 Reducing flood risk
 - P68 Sustainability standards
 - P69 Energy

70. Paragraph 8b suggests that health, social and cultural well-being are identified under the social objective of the NPPF 2019. Intentioned to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.
71. Paragraph 8c identifies the environmental objective to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, mitigating and adapting to climate change, including moving to a low carbon economy.
72. Paragraph 10 indicates that sustainable development is pursued in a positive way; at the heart of the Framework is a presumption in favour of sustainable development.
73. SP6 works to combine the three principles of sustainable development (economic, social and environmental) that will ensure that development is sustainably achieved. Its greatest emphasis is on the value of environmental objectives in contributing to meaningful social outcomes, which is detailed more specifically in the Council's evidence-base.

London Plan 2016

74. Chapter 5 of the London Plan sets out the Mayor's objective to make London a world leader in tackling climate change and improving the environment. The policies under SP6 support this aim and seek to improve energy efficiency to achieve the aim of becoming carbon neutral.

New London Plan

75. The overarching aim of the London Plan is to achieve "Good Growth", referred to in the policies in NSP as growth that is socially and economically inclusive and environmentally sustainable. It is the way in which sustainable development in London is going to be achieved, supporting paragraph 11 of the NPPF 2019. The Six Good Growth policies overarching all of the policies in the Plan:
- Policy GG1 Building strong and inclusive communities
 - Policy GG2 Making the best use of land
 - Policy GG3 Creating a healthy city
 - Policy GG4 Delivering the homes Londoners need
 - Policy GG5 Growing a good economy
 - Policy GG6 Increasing efficiency and resilience
76. SP6 works to achieve Good Growth as the strategic target of the London Plan, in particular support of GG6 which:

“Seeks to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero carbon city by 2050; and

- Ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, while mitigating against and avoiding contributing to the urban heat island effect; and
- Create a safe and secure environment which is resilient against the impact of emergencies including fire and terrorism; and
- Take an integrated and smart approach to the delivery of strategic and local infrastructure by ensuring that public, private, community and voluntary sectors plan and work together.”

77. Policies set out under SP6 also support the policies under Chapter 8 and Chapter 9 of the New London Plan. This is set out in more detail in the table below and is supported by the Energy Background Paper.

78. SP6 also works towards achieving Policy S11 to minimise carbon emissions through development that is ‘lean, clean and green’.

Compliance with the New London Plan’s strategic approach to development

79. Chapter 2 of the New London Plan sets out a strategic framework for the delivery of areas of London that will see significant development over the lifetime of the New London Plan. This includes opportunity areas such as Old Kent Road. To ensure the delivery of these areas, Area Action Plans have been/are being prepared to support development and growth as set out in the London Plan.

80. The NSP also complies with the SD4’s approach to the CAZ as well as the approach to the uses located within the CAZ as set out in SD5 where offices and other strategic functions are given greater weight than residential. This is also demonstrated through the NSP site allocations where employment uses are encouraged over residential.

81. SD5-SD9 of the New London Plan sets out a strategic approach to the development of town centres. The NSP’s hierarchy of town centres and policies relating to retail are in full conformity with the aims set out in SD8. This is set out in full in the retail background paper.

82. In line with the New London Plan’s policy SD10, Southwark has provided Area Action Plans and Opportunity Area Planning Frameworks in areas of regeneration to help tackle environmental, economic and social inequalities. All plans are available on the Southwark Council [website](#).

Summary of conformity with national and regional policies

NSP Policy	NPPF	London Plan 2016	London Plan (Intend to Publish 2019)
SP1 Quality affordable homes			
<p>P1 Social rented and intermediate housing</p>	<p>Policy P1 is consistent with the NPPF as 10% of affordable homes can be provided as home ownership. A full policy analysis is available in the Housing Background Paper.</p> <p>The National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (PPG) exempt development of 9 or fewer units from requiring affordable housing contributions. Policy P1 requires the provision of affordable housing on minor developments due to the acute need of affordable housing in the borough, further justification is provided in the Affordable Housing from Minor Developments Background Paper.</p>	<p>Policy 3.11 sets a requirement of requirement for the tenure split of affordable housing of 60% social/affordable rent and 40% intermediate housing. Policy P1 sets a requirement for a minimum of 25% (71%) affordable housing to be delivered as social rented housing and 10% (29%) affordable housing to be delivered as intermediate housing of the whole development. The exception to this is Aylesbury Action Plan Area. The higher requirement for social rented homes is due to the acute need in the borough.</p> <p>A full policy analysis is available in the Housing Background Paper.</p> <p>In the adopted London Plan boroughs are encouraged to</p>	<p>In general conformity with H4 of the NLP. The 5 and 15 year housing land supply can demonstrate the ability to meet the housing target set out by the adopted LP and NLP. In general conformity with H7 of the NLP which requires:</p> <ul style="list-style-type: none"> • a minimum of 30% low cost rented homes; • minimum of 30% intermediate products • the remaining 40% to be delivered by the borough as low cost rent or intermediate products <p>Policy P1 sets a requirement for a minimum of 25% (71%) affordable housing to be delivered as social rented housing and 10% (29%) affordable housing to be delivered as intermediate housing of the whole development. The exception to this is Aylesbury Action Plan Area.</p>

		<p>seek a lower threshold for affordable housing through the local development framework process where this can be justified in accordance with guidance and in light of their local circumstances (para 3.77). Policy P1 requires the provision of affordable housing on minor developments due to the acute need of affordable housing in the borough, further justification is provided in the Affordable Housing from Minor Developments Background Paper.</p>	<p>Policy P1 introduces the fast track route which is in general conformity with H6 of the NLP.</p> <p>A full policy analysis is available in the Housing Background Paper.</p> <p>In the Intend to Publish NLP reference to cash in lieu for the provision of affordable housing on minor developments has been removed as requested by the Inspectors.</p> <p>Policy P1 requires the provision of affordable housing on minor developments due to the acute need of affordable housing in the borough, further justification is provided in the Affordable Housing from Minor Developments Background Paper.</p>
P2 New family homes	Consistent with national guidance and the objective to protect the demand for family homes	In conformity with policy 3.8 to provide housing of different sizes and types	In conformity with policy H10 to providing a range of unit sizes having regard to local evidence
P3 Protection of existing homes	Consistent with national guidance and the objective to protect the demand for family homes	In line with Policy 3.14 of the London Plan and the Mayor's objective to maximize the number of housing units in London	In conformity with policy H8 to minimise the lose of existing homes

<p>P4 Private rented homes</p>	<p>Consistent with the NPPF and PPG 2018 – the NSP will require 35% affordable housing while the PPG sets 20% as a suitable benchmark. A full policy analysis and justification is available in the Housing Background Paper</p>	<p>In general conformity with Policy 3.8 to support PRS in addressing housing need. A full policy analysis is available in the Housing Background Paper</p>	<p>In general conformity with H11. The Mayor expects at least 30 per cent of DMR homes to be provided at an equivalent rent to London Living Rent with the remaining 70 per cent at a range of genuinely affordable rents. Policy P4 requires development proposing private rented homes to provide 35% affordable housing, a minimum of 15% should be provided as social rent equivalent and a minimum of 20% should be provided as affordable rent capped at London Living Rent. The bracket between £60,000 and £90,000 has been removed from the affordable housing requirements to be in general conformity with the NLP which requires discount market rent products to be capped at up to £60,000 incomes.</p> <p>A full policy analysis is available in the Housing Background Paper</p>
<p>P5 Student homes</p>	<p>Consistent with the NPPF's requirement to assess and reflect student housing need. A full policy context is</p>	<p>In general conformity with Policy 3.8 to provide a genuine choice of homes. A full policy analysis</p>	<p>In general conformity with Policy H17 as set out in the Student Housing Background Paper. Policy H17 requires</p>

	available in the Student Housing Background Paper	is available in the Housing Background Paper	the provision of 35% affordable student accommodation, Policy P5 requires student housing schemes to provide 35% affordable housing for direct lets and nomination schemes. Direct let schemes and nomination schemes where they are not providing rooms at affordable student rents are also required to provide 27% of student rooms at affordable student rent. It is important that we seek affordable housing provision on student accommodation schemes given the acute need of affordable housing in the borough and to ensure they do not compromise the delivery of affordable homes.
P6 Housing for older people	Consistent with para 61 of the NPPF to set out policies for specialist housing needs and to specify the affordable housing requirements as per para 62	In conformity with Policy 3.8 to provide a genuine choice of homes	P6 is in general conformity with H13 of the NLP
P7 Wheelchair accessible and adaptable housing		In conformity with Policy 3.8 to provide a genuine choice of homes.	In conformity with policy D7 as well as Part M of the Building Regulations
P8 Houses in multiple occupation		In general conformity with the London Plan to provide a choice of housing, including HMOs, when they are of a reasonable	IN general conformity with policy H9 D to recognize the role of HMOs in meeting housing need when they are of a reasonable standard

		standard	
P9 Supported housing and hostels		In conformity with Policy 3.8 to provide a genuine choice of homes.	In conformity with policy H8
P10 Self and custom build	In conformity with national legislation Self Build and Custom Housebuilding Act 2015 and PPG 2017.	n/a	n/a
P11 Homes for Travellers and Gypsies	Consistent with the NPPF and PPTS 2016 and is also supported by an accommodation needs assessment	In conformity with policy 3.8 to provide a range of housing options so people are free to live their lives in different ways	The GTAA carried out for the NSP has taken into consideration the potential need for an increase in pitch provision in accordance with a change to the definition in NLP Policy H14.
SP2 Regeneration that works for all			
P12 Design of places	P12 is consistent with Chapter 12 achieving well designed places	In general conformity with Chapter 7 of the London Plan	In general conformity with Chapter 3 of the emerging NLP to maximize good design of all places
P13 Design quality	P12 is consistent with Chapter 12 achieving well designed places	In general conformity with Chapter 7 of the London Plan	In general conformity with Chapter 3 of the emerging NLP to maximize good design of all places
P14 Residential Design	This policy is consistent with the NPPF's sustainable development principle, Chapter 11 making efficient use of land and Chapter 12 achieving well designed places. It is also in line with the PPG aims to plan for higher densities.	P14 is in general conformity with the London Plan's aims to optimise housing potential. The density matrix has been removed from the NLP with a focus on maximizing density through design led principles.	P14 is in general conformity with the London Plan's aims to optimise housing potential as well as the NLP policy D4. Conformity to this policy is evidenced in the GLA's representation dated 20 May 2019.
P15 Designing out crime	Consistent with Chapter 8	In conformity with Policy 7.3	In general conformity with policy D11 to

	Promoting healthy and safe communities and Secure by Design principles		create safe, secure and resilient places
P16 Tall buildings	Tall buildings support the Government's commitment to create more sustainable development that significantly boosts the supply of homes	In general conformity with Policy 7.7	In general conformity with policy D9 and supported by the Mayor as referenced in GLA's representation dated 20 May 2019. The changes suggested by the Mayor were made in order to ensure full conformity with the London Plan
P17 Efficient use of land	Consistent with the objectives set out in Chapter 11 Making efficient use of land and NPPG Effective use of land 2019	In general conformity with the Mayor's objective to make efficient use of land and resources	In general conformity with policy D3 in the NLP 2019 to optimize site capacity to make efficient use of land through good design principles
P18 Listed buildings and structures	In line with national legislation Planning (Listed Buildings and Conservation Areas) Act 1990 and paragraphs 189-202 of the NPPF	In general conformity with Policy 7.8	In general conformity with London Plan policies and guidance around protecting heritage and the historic environment and policy HC1
P19 Conservation areas	Consistent with the strategic policy to conserve and enhance the natural, built and historic environment and Chapter 16 paragraph 185	In general conformity with Policy 7.8	In general conformity with policy HC1 of the NLP
P20 Conservation of the historic environment and natural heritage	Consistent with the strategic policy to conserve and enhance the natural, built and historic environment and Chapter 16 paragraph 185	In general conformity with Policy 7.8 and Policy 7.20	In general conformity with policy HC1 of the NLP

P21 Borough views	Consistent with the strategic policy to conserve and enhance the natural, built and historic environment and Chapter 16	In conformity with Policy 7.11	Representation received from the GLA dated 20 May 2019 notes general conformity with the London Plan. Suggestions made in this representation were considered in the amended NSP.
P22 Archaeology	Consistent with the strategic policy to conserve and enhance the natural, built and historic environment and Chapter 16	In general conformity with Policy 7.8	Consistent with emerging policy HC1 Heritage conservation and growth
P23 World Heritage Sites	Consistent with the strategic policy to conserve and enhance the natural, built and historic environment and Chapter 16	In general conformity with Policy 7.10	Consistent with emerging policy HC1 Heritage conservation and growth
P24 River Thames	Consistent with Chapter 10 Promoting sustainable transport as well as national guidance relating to open space – this is referred to in more detail in the Open Space Background Paper	Consistent with London guidance to promote the social, economic and environmental benefits of the River Thames and in general conformity with policy 7.29 to protect and promote the role of the Thames	In general conformity with NLP policies SI14 to SI17
P25 Local list	In compliance with current regulations	n/a	n/a
SP3 Best start in life			
P26 Education places	Compliant with paragraph 94 of the NPPF and the strategic objective to provide community uses such as educational facilities	In general conformity with Policy 3.18	Compliant with S3 of the NLP and supported by a evidence base which assesses the need for educational facilities in Southwark
P27 Access to employment	Supports the social objective of the	In general conformity with	Compliant with S3 of the NLP as well as

and training	NPPF to promote healthy and safe communities by providing access to education and training	Policy 3.18	supporting policy E11
SP4 Strong local economy			
P28 Strategic protected industrial land	The NPPF (para 80-82) requires a clear economic vision which positively and proactively encourages sustainable economic growth with policies to recognise and address specific sectors and clusters of economic industries and Local Industrial Strategies. P28 proposes retention of 32ha of SPIL and 20ha of LSIS. Other areas of SIL release are promoted for innovative mixed use development coupled with the requirements of P29 to meet current market demands	Identifies Southwark as a limited transfer borough in relation to industrial land with exceptional planned release. Policy 2.17 references a strategically coordinated process of SIL consolidation through OAPFs (OKR AAP strategy is relevant). Policy 4.4 seeks a rigorous approach to industrial land management.	Identifies Southwark as a retain capacity borough with respect to industrial land. Policies E4-E7 are relevant. Introduces the principle of no net loss of industrial floorspace capacity overall but continues to support industrial intensification and co-location which is the strategy in the NSP. Industrial background paper explains approach in full to industrial strategy. The SoS recently directed changes to the London Plan to remove the requirement for Southwark to achieve no net loss of industrial capacity.
P29 Office and business development	The NPPF in paragraphs 80-82 sets out the need for a clear economic vision. It sets out the need for flexible working spaces, and flexible policy to allow for new and flexible working practices and respond to changes in economic circumstance. Paragraph 82 regards, emerging	Identifies Southwark as being in the CAZ, and as an inner London borough outside the CAZ and North Isle of Dogs (NIOD), and therefore projected to have an increase in office employment and floorspace demand. This need is met by policy interventions	Policy E2 of the emerging London Plan identifies a need for 60% additional office floorspace in the Central Activities Zone (CAZ). A significant proportion of the CAZ lies in the north of LB Southwark. Policy E1 sets out that additional office floorspace is needed. Policy P29

	<p>and existing clusters as providing locational benefits to offices. In Southwark, these clusters and preferred locations of office floorspace are the CAZ, town centres and in the opportunity area., and are employment floorspace in these areas are awarded the greatest protection is awarded in policy P29.</p>	<p>designed to achieve an uplift in employment floorspace. Paragraph 61.6 sets out the need for permitted development rights exemption in the CAZ to retain employment floorspace. LB Southwark have implemented an article 4 direction to prohibit the change of use from office (B1c) to residential (C3) without full planning consent. Policy 4.2 Policy 4.2 Offices sets out the Mayor's strategy for office development. The Mayor supports mixed use development and redevelopment of office provision to improve London's competitiveness and enhance attractions of businesses of all types and sizes. This policy recognises the needs of the central London office market and the focusing new development on viable locations that are accessible. Offices must also be flexible, and this can be achieved</p>	<p>protects against the loss of employment floorspace and encourages an uplift of office floorspace (B1c) in the CAZ, town centres, Opportunity areas and appropriate site allocations to meet this demand for office floorspace, in conformity with the London Plan.</p>
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		through renewal and modernization of existing stock. Policy P29 addresses these issues and is therefore in conformity with the adopted London Plan.	
P30 Affordable workspace	The NPPF places significant weight on the need to support economic growth and productivity, taking into account local business needs (para 80). NSP Policy P30 seeks to address local business needs to address supporting start-ups and retaining and supporting existing businesses in the borough throughout change.	Policy 4.1 supports suitable workspaces in terms of type, size and cost to support an increasingly diverse economy, supporting specialist clusters and innovation. NSP Policy P28 seeks to respond to the requirements for specific types of affordable workspace across different sectors and different parts of the borough.	Policy E3 introduces a specific policy on affordable workspace to support specific social, cultural or economic development purposes at rents below market rates and to support re-provision of existing affordable workspace. NSP Policy P28 addresses this requirement in a local context.
P31 Small shops	Consistent with the NPPF's objective to maintain the vitality of town centres and supports economic diversity. A full policy review is available in the Retail Background Paper.	In general conformity with Policy 4.9. A full policy review is available in the Retail Background Paper.	In general conformity with policy E9 to achieve a competitive and diverse market. A full policy review is available in the Retail Background Paper.
P32 Business relocation	The NPPF places significant weight on the need to support economic growth and productivity, taking into account local business needs (para 80). NSP Policy P32 specifically	Policy 4.1 seeks to support and promote the distinctive and crucial contribution to London's economic success made by central London and its specialist clusters	Policies E2 and E3 look to support existing business space (including creative and artists' workspace) particularly of lower cost and provide affordable workspace. NSP

	addresses existing local business needs in terms of the potential need to relocate and manage the phasing of development.	of economic activity. By retaining and enabling suitable relocation of existing businesses, NSP Policy P32 addresses this.	Policy P32 seeks to support businesses in need of relocation which may potentially also benefit from affordable workspace terms if eligible.
P33 Railway arches	The NPPF (para 80-82) requires a clear economic vision which positively and proactively encourages sustainable economic growth with policies to recognise and address specific sectors and clusters of economic industries. Policy P33 seeks to enliven railway arches and make use of over 800 arches in Southwark to promote commercial activity, active frontages and walking routes.	Policy 4.1 supports suitable workspaces in terms of type, size and cost to support an increasingly diverse economy. Policy 4.8 supports a range of retail uses. Policy 4.4. supports industrial uses. Policy P33 seeks to enliven railway arches and make use of over 800 arches in Southwark to promote commercial activity, active frontages and walking routes	Policy E2 refers to low cost business space in secondary and tertiary space in non-prime locations such as railway arches which may by nature be more affordable. Policy P33 seeks to enliven railway arches and make use of over 800 arches in Southwark to promote commercial activity, active frontages and walking routes.
P34 Town and local centres	These policies are consistent with the NPPF and in general conformity with regional guidance and informed by a robust evidence base prepared with specific reference to the economy in Southwark. Consistent with the NPPF's objective to maintain the vitality of town centres and supports economic diversity.	Policy 2.15 explains the strategic approach for town centre development,. In particular, London's network of town centres as set out in Map 2.6 and Annex 2 of the London Plan. These policies are consistent with the London Plan and set out Town Centre Network in conformity with the London Plan. A full	SD6 encourages strong, resilient, accessible, and inclusive hubs with a diverse range of uses, including main town centre uses, night-time economy, civic, community, social and residential uses. SD7 outlines that boroughs should take a sequential approach. This is defined as a town centres first approach supported by the discouraging
P35 Development outside of town centres			

	A full policy review is available in the Retail Background Paper.	policy review is available in the Retail Background Paper.	of out-of-centre development of main town centre uses. SD8 states that the changing role of town centres should be proactively managed in relation to the town centre network as a whole, a vital element of London's economy. P34 and P35 seek to ensure that town and local centres are the main focus for new developments providing the main town centres uses A full policy review is available in the Retail Background Paper.
P36 Protected shopping frontages	These policies are consistent with the NPPF, which sets out the need to take a positive approach to the growth, management and adaption of town centres. P36 aims to manage protected shopping frontages by ensuring that the percentage of units within the A1 Use Class does not fall below a particular percentage.	Policy 4.8 supports successful, competitive and a diverse retail sector which promotes sustainable access to goods and services. It requires boroughs to manage clusters of uses, and provide a policy framework for maintaining, managing and enhancing local and neighbourhood shopping facilities. P36 aims to manage protected shopping frontages by ensuring that the percentage of	SD6 Town centres and high streets highlights that household expenditure on retail is expected to rise but distributed unevenly among town centres. P36 and P37 allow for a more context specific approach to be taken through designating primary and secondary shopping frontages. SD7 states that should define specific policy-related designations such as primary and secondary frontages.
P37 Shops outside protected shopping frontages, town and local centres			

		units within the A1 Use Class does not fall below a particular percentage	
P38 Shop fronts	<p>Consistent with the NPPF’s objective to maintain the vitality of town centres and supports economic diversity.</p> <p>This policies is consistent with the NPPF and in general conformity with regional guidance and informed by a robust evidence base prepared with specific reference to the economy in Southwark.</p>	In general conformity with Chapter 4 of the London Plan 2016	In general conformity with Chapter 2 of the NLP 2019
P39 Betting shops, pawnbrokers and pay day loan shops	<p>The NPPF, section 8 Promoting healthy and safe communities, states that planning policies and decisions should ‘enable and support healthy lifestyles, especially where this would address identified local health and well-being needs’.</p> <p>P39 aims to manage the proliferation of betting shops, pawnbrokers and payday loan shops and their resulting impact on the health and wellbeing.</p>	Policy 4.8 supports successful, competitive and a diverse retail sector which promotes sustainable access to goods and services. It requires boroughs to manage clusters of uses, and provide a policy framework for maintaining, managing and enhancing local and neighbourhood shopping facilities. A full policy review is available in the Retail Background Paper.	SD6 seeks to ensure that the over-concentration of betting shops, pay day loan shops and pawnbrokers does not harm overall town centre diversity, vitality and viability. E9 supports a diverse and competitive retail sector. The policy recognises that over-concentrations of some uses including, betting shops, pawnbrokers, pay-day loan stores and hot food takeaways can have an affect on health outcomes, wellbeing, amenity, vitality and viability. P39 aims to manage the proliferation of betting shops,

			pawnbrokers and payday loan shops and their resulting impact on the health and wellbeing
P40 Hotels and other visitor accommodation	Consistent with Chapter 7 Ensuring the vitality of town centres by balancing a mix of uses. A full policy review is available in the Hotels Background Paper.	In general conformity with Policy 4.5. A full policy review is available in the Hotels Background Paper	In general conformity with the Mayor's intention to achieve a balance of uses in the CAZ having regard to local circumstances and Policy E10.
P41 Pubs	Consistent with the social and economic objectives of the NPPF. Para 92 requires planning positively for public houses as well as positively contributing to the vitality of town centres	Consistent with Policy 4.8. Para 4.48A states the Mayor recognises the important role of London's public houses and the social fabric of communities. Boroughs are encouraged to bring forward policies to retain, manage and enhance public houses. P41 seeks to protect pubs from change of use, or demolition as a result of development to ensure Southwark residents have access to key form of social infrastructure.	Consistent with policy HC7 requires boroughs to protect public houses where they have a heritage, economic, social or cultural value to local communities. P41 seeks to protect pubs from change of use, or demolition as a result of development to ensure Southwark residents have access to key form of social infrastructure.
P42 Outdoor advertisements and signage	Consistent with NPPG Advertisements 2019	n/a	Supports policy D8 of the NLP Intend to Publish 2019
P43 Broadband and digital infrastructure	With regards to the provision of widespread digital connectivity, paragraph 112	n/a	In conformity of the NLP Intend to Publish 2019 S16 Digital connectivity infrastructure

	states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks		
SP5 Healthy, active lives			
P44 Healthy developments	Consistent with national guidance to promote healthy, active lifestyles	In general conformity with the overall objective to promote Londoner's health and policy 3.2 D to provide developments improve and promote healthy lifestyles	In general conformity with emerging NLP policy GG3 creating a healthy city
P45 Leisure, arts and culture	Consistent with the Chapter 7 Ensuring the vitality of town centres and the principle that a range of uses are necessary for a vibrant town centre	In general conformity with Policy 4.6	In general conformity with the London Plan as referenced in the GLA's representation on the NSP dated 9 th March 2018
P46 Community uses	Consistent with the Chapter 7 Ensuring the vitality of town centres and the principle that a range of uses are necessary for a vibrant town centre	In general conformity with the London Plan's objective to provide social infrastructure and policy 3.16 to protect and enhance social infrastructure	In general conformity with London guidance locally orientated uses to allow for a vibrant mixed use area and policy S1 to maintain social infrastructure
P47 Hot food takeaways	Consistent with national guidance to promote healthy, active lifestyles	In general conformity with the overall objective to promote	In general conformity with policy E9 part D of the NLP

		Londoner's health and policy 4.8 to support a diverse retail sector, particularly as an over-concentration of hot food takeaways can be a concern	
P48 Public transport	Policy consistent with NPPF objective to promote sustainable transport	In general conformity with Chapter 6	In general conformity with the NLP's overall objective to promote sustainable methods of transport and policy T1 to increase the trips made in London by foot, cycle or public transport
P49 Highways impacts	Policy consistent with NPPF objective to promote sustainable transport	In general conformity with Policy 6.12	In general conformity with the NLP's overall objective to promote sustainable methods of transport and policy T1 to increase the trips made in London by foot, cycle or public transport and policy T4
P50 Walking	Policy consistent with NPPF objective to promote sustainable transport	In general conformity with Policy 6.10	In general conformity with the NLP's overall objective to promote sustainable methods of transport and policy T1 to increase the trips made in London by foot, cycle or public transport
P51 Low Line walking routes	Policy consistent with NPPF objective to promote sustainable transport	In general conformity with the London Plan's overall strategy to improve cycling and walking in London	In general conformity with the NLP's overall strategy to improve cycling and walking in London
P52 Cycling	Policy consistent with NPPF objective to promote	In general conformity with Policy 6.9	In general conformity with the NLP's overall strategy to

	sustainable transport		improve cycling and walking in London and policy T5
P53 Car parking	A Statement of Common Ground has been agreed with TfL to work on policies relating to car parking		
P54 Parking standards for disabled people and mobility impaired			
SP6 Cleaner, greener, safer			
P55 Protection of amenity	Consistent with Chapter 12 Achieving well designed places by protecting amenity as set out in para 217(f)	In general conformity with the London Plan objective to protect and promote amenity space	In general conformity with London Plan guidance to maintain a design led approach that enhances a user's amenity space
P56 Open space	The 2019 National Planning Policy Framework (NPPF) (and its predecessors) does not provide specific guidance available on conducting a MOL review. Therefore it is the responsibility for each borough to produce its own assessment criteria for designating MOL and fine-tuning MOL boundaries in future iterations of the plan, to ensure the most sustainable outcomes A full policy analysis is available in the Open Space Background Paper	The policy is in general conformity with Policy 7.17 of the London Plan.	The policy is in conformity with the emerging London Plan which includes Policy G3 on MOL. The requirements of this policy are similar to the adopted London Plan, i.e. the need to protect MOL from inappropriate development, including development which has the potential to harm MOL, and encouraging the enhancement of quality and range of uses for MOL. A full policy analysis is available in the Open Space Background Paper
P57 Open water space	Open water space review was completed under a MOL review with the same limitations as PPG Open space, sports and	In general conformity with Policy 7.18. A full policy analysis is available in the Open Space Background Paper	The policy is in general conformity with the emerging NLP policy S117 A full policy analysis is available in the

	<p>recreation facilities, public rights of way and local green space”.</p> <p>There is no supplementary guidance from the Mayor or Central government on waterside development.</p> <p>A full policy analysis is available in the Open Space Background Paper</p>		Open Space Background Paper
P58 Green infrastructure	<p>The policy is consistent with paragraph’s 81, 150, 171, 181. It also supports the objectives set out in the PPG Natural Environment 2016.</p> <p>A full policy analysis is available in the Open Space Background Paper</p>	<p>In general conformity with Chapter 7 of the London Plan to protect and enhance London’s living spaces which includes green infrastructure.</p> <p>A full policy analysis is available in the Open Space Background Paper</p>	<p>In general conformity with policy G1 of the NLP to protect and enhance green infrastructure.</p> <p>A full policy analysis is available in the Open Space Background Paper</p>
P59 Biodiversity	<p>Consistent with the Chapter 15 of the NPPF to enhance and conserve the natural environment as well as the PPG Natural Environment – Biodiversity sections 2019</p> <p>A full policy analysis is available in the Open Space Background Paper</p>	<p>In general conformity with Policy 7.19 of the adopted London Plan requires protection, enhancement, creation, promotion and management of biodiversity.</p> <p>A full policy analysis is available in the Open Space</p>	<p>Policy G6 of the Draft New London Plan includes Biodiversity and access to nature continues the same requirements of the Biodiversity (Action Plans) where harm requires compensation.</p> <p>A full policy analysis is available in the Open Space Background Paper</p>

		Background Paper	
P60 Trees	The policy is consistent with paragraphs 81, 150, 171, 181. It also supports the objectives set out in the PPG Natural Environment 2016.	In general conformity with policy 7.21	In general conformity with policy G1 of the NLP to protect and enhance green infrastructure as well as G5 to protect veteran trees.
P61 Reducing waste	The policy is consistent with the NPPG Climate Change 2019 Chapter 14 of the NPPF which sets out the national policy for meeting the challenge of climate change	The policy is in general conformity with the adopted London Plan 2016 policy 5.2: Be lean, be clean, be green and policy 5.6 decentralised energy.	The policy is in general conformity with the draft NLP's policy to improve air quality and minimize green house gas emissions.
P62 Land for waste management	The policy is consistent with the NPPG Climate Change 2019 Chapter 14 of the NPPF which sets out the national policy for meeting the challenge of climate change by reducing transport by dumping waste in landfills	The policy supports the London Plan 2016 where the Mayor of London set out that Southwark needs to have waste management facilities that are capable of processing 247,000 tonnes of waste by 2036, and 308,000 tonnes of waste by 2041.	In conformity with Policy SI8 to manage waste sustainably
P63 Contaminated land and hazardous substances	In line with NPPG Land affected by contamination 2019	In general conformity with policy 5.21 and 5.22	In general conformity with SI8
P64 Improving air quality	The policy is consistent with the NPPG Climate Change 2019 Chapter 14 of the NPPF which sets out the national policy for meeting the challenge of	The policy is in general conformity with the adopted London Plan 2016 policy 5.2: Be lean, be clean, be green and policy 7.14	The policy is in general conformity with the draft NLP's policy GG6 to become a more efficient and resilient city and policy SI 1.

	climate change, flooding and coastal change. A core principle of which is that the planning system should support the transition to a low carbon future including through support of renewable and low carbon energy and associated infrastructure.		
P65 Reducing noise pollution and enhancing soundscapes	Consistent with the NPPF's objectives to achieve well designed places that protect the amenity of future users	In general conformity with policy 7.15	In general conformity with the NLP's policy for a design led approach (policy D3) that will enhance the experience of the user of a place
P66 Reducing water use	The policy is consistent with the National Infrastructure Delivery Plan 2016-2021 and Chapter 14 of the NPPF which sets out the national policy for meeting the challenge of climate change	In general conformity with policy 5.15	In general conformity with the NLP policy SI 5 to minimize the use of water supplies
P67 Reducing flood risk	Consistent with the National Infrastructure Delivery Plan 2016-2021 and Chapter 14 of the NPPF which sets out the national policy for meeting the challenge of climate change, flooding and coastal change	In general conformity with policy 5.12	In general conformity with SI12 to manage flood risk
P68 Sustainability standards	The policy is in general conformity with the NPPG Climate Change	The policy is in general conformity with the adopted London Plan 2016	The policy is in general conformity with the draft NLP's policy GG6 to

	<p>2019 and Chapter 14 of the NPPF which sets out the national policy for meeting the challenge of climate change, flooding and coastal change. A core principle of which is that the planning system should support the transition to a low carbon future including through support of renewable and low carbon energy and associated infrastructure.</p>	<p>policy 5.2: Be lean, be clean, be green and policy 5.6 decentralised energy.</p>	<p>become a more efficient and resilient city</p>
<p>P69 Energy</p>	<p>The policy is in general conformity with the NPPG Climate Change 2019 and Chapter 14 of the NPPF which sets out the national policy for meeting the challenge of climate change, flooding and coastal change. A core principle of which is that the planning system should support the transition to a low carbon future including through support of renewable and low carbon energy and associated infrastructure.</p>	<p>The policy is in general conformity with the adopted London Plan 2016 policy 5.2: Be lean, be clean, be green and policy 5.6 decentralised energy.</p>	<p>The policy is in general conformity with the draft NLP's policy GG6 to become a more efficient and resilient city as well as policy SI 3.</p>

Appendix A

Legal Compliance Checklist

This legal compliance checklist sets out the compliance of the process of writing the NSP with the Planning and Compulsory Purchase Act 2004 (as amended), the Town and Country Planning (Local Planning) (England) Regulations 2012, the National Planning Policy Framework 2019 and the National Planning Practice Guidance: Plan-making 2019.

Compliance with the Planning and Compulsory Purchase Act 2004 (as amended)

The below table summarises the compliance of the NSP with the Planning and Compulsory Purchase Act 2004 (as amended).

Section	Compliance
8(1)	The NSP has indicated that it is a local plan and is dated with the date of Submission to the Planning Inspectorate
8(2)	A full evidence base which includes background papers justifies the approach set out in the NSP and is available on the Examination webpage
8(4)(5)	Any deviation in policy from the adopted plan has been justified in the background papers
9	The policies map has been prepared in accordance with Section 9
15(1)	A LDS has been prepared and kept updated on the council website
15(2)	The LDS has set out the development plan documents and the timetable for the revision of these documents
17(3)	The NSP sets out Southwark's policies relating to development and the use of land. Supplementary Planning Documents are being updated and prepared to provide more detailed information on certain policies
19(1)	<p>The NSP has been prepared under the LDS which is available on the website.</p> <p>Under SP6 the NSP sets out policies to deal with the climate emergency. These policies are supported by a robust evidence base and are in conformity with national and regional policies as set out above</p> <p>The NSP has been written with six strategic priorities that are supported by a number of policies and site allocations The policies supporting the strategic objectives of the borough are set out in the NSP</p>
19(2)	As set out above, the NSP is in conformity with national and regional policies
19(3)	Consultation on the NSP took place in accordance with the adopted SCI. This is set out in detail in the Consultation Plan and Consultation Report
19(5)	All policies are supported by a robust evidence base to ensure

	the sustainability of the policies. This is set out on the Examination website
20(1)	The NSP was submitted to the Secretary of State for examination in January 2020
20(2)	The NSP has met all of the requirements set out in the Planning and Compulsory Purchase Act 2004 (as amended) and was considered to be ready for examination
20(3)	The Secretary of State was provided with all supporting documents and will be provided with any additional information as required
20(6)	Respondents to the previous two rounds of consultation were asked to provide contact details should they want to appear at the examination. This list has been given to the Planning Inspectors.
24(1)	As set out above and as evidenced by the Mayor's representation to previous consultations, the NSP is in general conformity with the London Plan and emerging New London Plan
24(4)	A Statement of Common Ground has been written with the Mayor which sets out the general conformity with the London Plan
24(5)	As stated above, the Mayor has made previous representations giving his opinion on the conformity of the NSP with the London Plan and emerging New London Plan
24(7)	The Mayor has made representations seeking changes to the NSP. This has been set out in the Statement of Common Ground written with the GLA
33(1)	A Statement of Common Ground has been prepared with adjoining local authorities and prescribed bodies to achieve our duty to cooperate

Compliance with the Town and Country Planning (Local Planning) (England) Regulations 2012

The Consultation Report outlines each step of consultation that took place throughout the process of writing this plan. The below table sets out a summary checklist demonstrating how the compliance of the NSP with the 2012 Regulations.

Regulation	Compliance
Regulation 4	As set out under the Planning and Compulsory Purchase Act 2004 (as amended) we have a duty to cooperate with prescribed bodies and local authorities. These prescribed bodies are listed under Regulation 4. A Statement of Common Ground has been prepared with the relevant bodies
Regulation 18(1)	Between October 2015 and February 2016 the council consulted on the Preferred Option draft of the policies of the New Southwark Plan, including high-level strategic policies, set out across the key "fairer future" themes that the council will

	<p>help to deliver (such as “Quality Affordable Homes” and “Cleaner, Greener, Safer”). The outcome to this stage of consultation is set out in the consultation report that was published concurrently with the NSP: Area Visions and Site Allocations (Preferred Option) document</p> <p>The Area Visions and Site Allocations consultation formed the second part of the Preferred Option stage and was consulted on from February to July 2017. Since the close of these consultations, the council has had the opportunity to review the responses received and produced a set of New and Amended policies which was consulted on in an ‘interim’ consultation from June to September 2017</p> <p>All statutory consultees and members of the wider community were notified of this consultation and invited to make representations</p>
Regulation 18(2)	<p>Consultees listed under 18(2) were notified of the consultation via MySouthwark, council social media, posters in libraries and newspaper notices</p>
Regulation 18(3)	<p>All comments received at this round of consultation were considered and the plan was amended where necessary to shape the NSP Proposed Submission Version. Consultation reports have been published at each stage of consultation on the NSP</p>
Regulation 19	<p>All statutory consultees were notified and invited to make a representation for consultation in January - May 2019 for the Amended Policies and October 2017 - February 2018 for the Proposed Submission Version</p> <p>As set out in the Consultation Report, consultees were notified of the consultation via MySouthwark, council social media, posters in libraries and newspaper notices for consultation that took place in January - May 2019 for the Amended Policies and October 2017 - February 2018 for the Proposed Submission Version</p> <p>All comments received at consultation were considered and responded to by the council. This is available on the Examination webpage: https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/new-southwark-plan</p> <p>The NSP and all accompanying documents and evidence base was made available on the council website and consultees were invited to make representations as per the above methods and as stated in the Consultation Report</p>
Regulation 20(1)	<p>Representations were accepted from anyone who chose to comment throughout each stage of consultation. These comments have been submitted to the Planning Inspectors</p>

Regulation 20(2)	Consultation plans and statements of representations procedure indicated the closing date of each consultation with responses received before this deadline
Regulation 21	The above document sets out the conformity of the NSP with the London Plan. The Mayor sent representations on 20 May 2019 and 9 March 2018 in response to consultations on the document. A Statement of Common Ground has also been written with the GLA.
Regulation 22(1)	All documents listed under Regulation 22(1) were submitted to the Secretary of State and made available on the council's Examination webpage.
Regulation 22(2)	A hard copy and an electronic copy of the specified documents have been sent to the Inspectors
Regulation 22(3)	<p>All documents submitted to the Inspector have been uploaded onto the Examination webpage in line with Regulation 35. The plan is also available to view at the council offices (access to these documents has been affected by restrictions relating to COVID-19. Alternative arrangements are set out in the NSP Consultation Plan).</p> <p>A link to find these documents has been sent to consultees via MySouthwark (this includes statutory consultees).</p> <p>Notification of the submission of the NSP was sent to all MySouthwark users.</p>

Compliance with the National Planning Policy Framework 2019

The below table summarises the compliance of the NSP with the requirements for plan-making set out in the National Planning Policy Framework 2019.

Paragraph	Compliance
15	The NSP supports the objective for a plan-led planning system by providing a positive vision for each area of the borough and policies for
16	The NSP has been positively prepared to achieve sustainable development and has been shaped by different stages of consultation and engagement in line with our adopted SCI. Consultation was carried out online as well as using other methods. All documents relating to the NSP are available on the council website.
17	The NSP has six strategic policies (SP1 – SP6) to address local need within the borough. Each strategic policy is supported by development management policies to assist in the decision making process.
18	There are 69 non-strategic policies in the NSP
20	SP1 – SP6 set out the strategic aims of the plan which include the provision of housing, employment, community facilities and a cleaner environment

21	As set out in the NPPF, the strategic policies are well distinguished from the non-strategic policies
22	The NSP covers a period of 15 years
23	A key diagram has been updated and submitted to the Planning Inspectors
24	Our duty to cooperate with local authorities and prescribed bodies has been achieved through the writing of a Statement of Common Grounds
26	Ongoing conversations with relevant bodies and local authorities have occurred to identify any need for joint working
27	All Statements of Common Ground can be found on the Examination website
28	The NSP has set out a number of site allocations to help achieve the objectives set out in the strategic policies
31	A full robust evidence base is available on the Examination website which supports and justifies the policies set out in the NSP
33	The LDS will set out when reviews of the plan will take place
34	The plan and relevant SPDs set out the contributions required from development
35	The NSP is considered to be sound. The soundness of the local plan has also been tested through consultation on the Proposed Submission Version and the Amended Policies.

Compliance with National Planning Practice Guidance: Plan-making 2019

The below table summarises the compliance of the NSP with the requirements for plan-making set out in the National Planning Practice Guidance: Plan-making 2019.

Paragraph	Compliance
Paragraph: 002 Reference ID: 61-002-20190315	The NSP has been written in accordance with the requirements set out in the NPPG and includes site allocations with sufficient detail to provide clarity, a policies map
Paragraph: 003 Reference ID: 61-003-20190315	The LDS has been written in compliance with Section 15 of the Planning and Compulsory Purchase Act 2004
Paragraph: 009 Reference ID: 61-009-20190315	As set out in the NPPF and NPPG, a Statement of Common Ground has been written with local authorities and prescribed bodies
Paragraph: 011 Reference ID: 61-011-20190315	All Statement of Common Grounds have been written within the scope set out in in the NPPG
Paragraph: 062 Reference ID: 61-062-20190315	The LDS sets out when a review of the local plan will take place
Paragraph: 073 Reference ID: 61-073-20190315	The website has been updated with historic AMRs as well as up to date facts and figures as required by the NPPG
Paragraph: 034	A Sustainability Appraisal and a full evidence base has been

Reference ID: 61-034-20190315	prepared. All submission documents have been made available to allow for representations throughout previous consultations
Paragraph: 036 Reference ID: 61-036-20190723	The evidence base has assessed and identified local need to write policies with the presumption of sustainable development
Paragraph: 037 Reference ID: 61-037-20190315	A Sustainability Appraisal and HRA have been prepared in line with the guidance set out in the NPPG
Paragraph: 039 Reference ID: 61-039-20190315	Evidence relating to housing has been assessed as set out in the NPPG
Paragraph: 040 Reference ID: 61-040-20190315	Evidence relating to employment has been assessed as set out in the NPPG
Paragraph: 041 Reference ID: 61-041-20190315	The evidence base has been used to inform policies relating to business
Paragraph: 043 Reference ID: 61-043-20190315	Evidence relating to biodiversity and the environment has been assessed as set out in the NPPG
Paragraph: 044 Reference ID: 61-044-20190315	Evidence relating to climate change has been assessed as set out in the NPPG
Paragraph: 045 Reference ID: 61-045-20190315	Evidence relating to conservation and the historic environment has been assessed as set out in the NPPG
Paragraph: 046 Reference ID: 61-046-20190315	Evidence relating to health and well-being has been assessed as set out in the NPPG
Paragraph: 048 Reference ID: 61-048-20190315	Evidence relating to viability has been assessed as set out in the NPPG
Paragraph: 051 Reference ID: 61-051-20190315	Prior to the submission of the NSP, it was consulted on to receive representations on the Proposed Submission and Amended Policies
Paragraph: 052 Reference ID: 61-052-20190315	The plan and supporting documents were submitted to the Inspectors with the representations received at consultation
Paragraph: 054 Reference ID: 61-054-20190315	Changes made after consultation were submitted to the Inspector for consideration