

Representation	Officer Response
<p data-bbox="188 317 472 347">SP5 Healthy active lives</p> <p data-bbox="188 357 365 421">Derek Kinrade NSPPSV47.10</p> <p data-bbox="188 464 714 494">SP5: new text needs a simpler presentation.</p>	<p data-bbox="1140 392 1951 456">Representation noted, the plan will be designed up after it has been examined.</p>
<p data-bbox="188 576 353 639">Susan Crisp NSPPSV456.1</p> <p data-bbox="188 683 477 713">"The policy is not sound</p> <p data-bbox="188 756 1005 820">The NSP will not achieve this objective "7. Increasing, protecting and improving green spaces".</p> <p data-bbox="188 863 882 916">See comments below set out against Policy 56 Open Land. "</p>	<p data-bbox="1140 614 2040 895">Representation noted. SP5 Healthy, actives lives set out a series of policies that will maintain and improve the health and wellbeing of our residents, including through 'increasing, protecting and improving green spaces'. This protection of green spaces is primarily addressed in P56 Open Space, which does not permit development on Metropolitan Open Land (MOL), Borough Open Land (BOL) and Other Open Space (OOS), other than in defined exceptional circumstances which maintain the principle of increasing, protecting and improving green spaces.</p> <p data-bbox="1140 938 2047 1145">Whilst P56, doesn't specifically refer to maintaining the openness of MOL as suggested in your comments set out on P56 Open Space, it is important to recognise that the NSP should be read as a whole. P12 Design of Places, states that development must ensure height, scale, massing and arrangement respond positively to the existing townscape, character and context' – this would include any designated MOL, BOL and OOS.</p>
<p data-bbox="188 1190 358 1254">Sarah Vaughn NSPPSV502.3</p> <p data-bbox="188 1297 1088 1434">"Document: NSP EIP 27A Policy: SP5 Healthy Active Lives Not positively prepared The retention of existing large canopied trees and the targeted planting of new trees and hedges is proven to reduce pollution by up to 60% on traffic-</p>	<p data-bbox="1140 1265 2029 1366">Representation Noted. SP5 Healthy, actives lives set out a series of policies that will maintain and improve the health and wellbeing of our residents, including through 'increasing, protecting and improving green spaces'.</p> <p data-bbox="1140 1409 1944 1439">It is important to recognise that the NSP should be read as a whole:</p>

filled streets as well as reducing the heat-island affect and cooling streets and buildings by as much as 10 degrees. Trees also help reduce flooding through rainwater capture and by absorbing large quantities through their roots. Retrofitting tree-pits, de-paving and creating swales and rain gardens incorporating trees and shrubs is vital to mitigate against the effects of climate change. Even small pockets of open space and trees are important for physical and mental well-being. The importance of trees and green infrastructure cannot be overstated in almost every area of the NSP.

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P60 Trees states that 'development will be permitted if trees are planted as part of landscaping and public realm schemes, commensurate to the scales and type of development', and 'development must retain and enhance the borough's trees and canopy cover'. The retention of existing significant trees and the targeted planting of trees is addressed in this policy.

The general protection of green spaces is primarily addressed in P56 Open Space, which does not permit development on Metropolitan Open Land (MOL), Borough Open Land (BOL) and Other Open Space (OOS), other than in defined exceptional circumstances. P58 Green Infrastructure, requires major development to provide green infrastructure, in particular, designed to provide multiple benefits for the health of people and wildlife. P64 Air quality, also recognises the importance of urban greening to mitigate the effects of poor air quality. The NSP is positively prepared to ensure that green infrastructure, open space, trees and the wider urban realm contribute to the health and wellbeing of our residents and mitigate the effects of climate change.

Old Bermondsey Neighbourhood Forum
NSPPSV132.4

"Document: NSP EIP 27A Policy SP5: Healthy Active Lives

Not positively prepared or effective.

The new additional wording of Reason 2 (re. health deprivation..) of points 6

" Delivering a safer walking and cycling network to address the climate

emergency" and of point 7 " Increasing, protecting and improving green

spaces". are supported however this is vague and not

clear/achievable/monitorable given the weaknesses of the following policies

and their supporting evidence P50, P52 and P55-60 - see comments below

e.g. P 59 where off-site provision is allowed for: It is similarly presently

unsound when Site Allocations Policies are considered (e.g. 50 and 51) which

Representation noted. SP5 Healthy, active lives set out a series of policies that will maintain and improve the health and wellbeing of our residents. SP5 is a strategic policy which sets out the council's regeneration strategy to work with local people to improve neighbourhoods and create new opportunities for the future. They are also used to set the context for our detailed planning policies and to make planning decisions.

The policies P50, P52 and P55-P60 are supported by a proportionate evidence base: SP503 - The Impact of Planning Policy on Health Outcomes and Health Inequalities in Southwark and Lambeth (2017); SP506 – Movement Plan (2019), SP507 - Southwark Cycling Strategy (2015); SP601 - Open space background paper; SP602 - Southwark Open Space Strategy (2013); SP605 - Southwark Biodiversity Action Plan 2013 – 2019 (2013).

allow for extreme increases in density that do not take due account of the capacity of local infrastructure (walking, cycling, transport, green) within the expanded/true area of their effect and which do not positively frame ambitious enough development in terms for example of real biodiversity, whilst also allowing for the extreme negative impacts of construction stage pollution and disruption caused by the over-development which they allow for.

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The Integrated Impact Assessment (IIA) sets out how this plan will be monitored through Baseline Indicators, see Appendix 3: Baseline Data. Each of the baseline indicators are attributed to specific IIA objectives which have been used during the appraisals of the NSP. For example, Life expectancy at birth, Journey to work by mode, Frequency of Cycling as mode of transport in the borough, Number of SINCS sites, Number of Local Nature Reserve Sites Number of Open Spaces per 1,000 people, Provision of Public Parks per 1,000.

IP1 Infrastructure and IP2 Transport Infrastructure, ensure that physical, social and transport infrastructure supports the needs of residents, including where increases in density have been planned for through the site allocations.

Corinne Turner
NSPPSV40.2

"SP5: Healthy, active lives and P44 Healthy developments, P45 Leisure, arts and culture, P46 Community uses

I do not consider these policies to be sound because there is:

☒ inadequate provision of inclusive and accessible, free at source and 'pay as you go' sports facilities such as swimming pools, tennis courts and gyms etc., that if they existed would enable all Southwark residents a chance to enjoy healthy activities not just the wealthy, and the well being of individuals might be a reality, not just an aspiration

☒ inadequate provision for all of inclusive and accessible community places, including open, green and social spaces, that are essential for residents to maintain healthy active lives"

Representation noted. SP5 Healthy, active lives, P44 Healthy Developments, set how we will maintain and improve the health and wellbeing of our residents.

P45 Leisure, arts and culture, P46 community Uses seek to retain community and leisure, arts and cultural facilities and increase the provision, ensuring they are 'accessible for all members of the community'.

The general protection of green spaces is primarily addressed in P56 Open Space, which does not permit development on Metropolitan Open Land (MOL), Borough Open Land (BOL) and Other Open Space (OOS), other than in defined exceptional circumstances. P58 Green Infrastructure, requires major development to provide green infrastructure, in particular, designed to provide multiple benefits for the health of people and wildlife. The NSP is positively prepared to ensure that green infrastructure, open space, trees and the wider urban realm contribute to the health and wellbeing of our

<p>Eileen Conn NSPPSV56.2, .3</p> <p>"SP5 Healthy, active lives page 37 P44 Healthy developments page 143 P46 Community Uses page 145. These three policies are unsound because they are not positively prepared, not justified and not effective. They do not address the lack of quality places and spaces in neighbourhoods for community socialising. It is well understood that being able to socialise and interact is a key part of mental and physical health. The pandemic has emphasised the importance of this at the local level and within walking distance of where people live. There is evidence that there is already significant unmet need. Eg SP503 Public Health Findings. The extent of redevelopment encouraged by the NSP will bring many additional people to live in many areas. If there are already inadequate places for local socialising and interaction, or there are additions to the numbers of residents, the places will become more inadequate to serve residents. This will not maintain and improve the health and wellbeing of local people or enable regeneration that works for all. Without a sound policy on the provision of local spaces for socialising, SP2 'Regeneration that works for all' cannot be achieved either and so is also unsound. "</p> <p>"Suggested changes: SP5 Healthy, active lives page 37 - "We will maintain and improve the health and wellbeing of our residents ... by - add a new numbered statement: 2a. Providing adequate places and spaces in local neighbourhoods for community socialising appropriate for access by all groups across the diverse communities"</p>	<p>residents and mitigate the effects of climate change.</p> <p>Representation noted. SP5 Healthy, active lives set out a series of policies that will maintain and improve the health and wellbeing of our residents. SP5 is a strategic policy which sets out the council's regeneration strategy to work with local people to improve neighbourhoods and create new opportunities for the future.</p> <p>P45 Leisure, arts and culture, P46 community Uses seek to retain community and leisure, arts and cultural facilities and increase the provision, ensuring they are 'accessible for all members of the community'. This would ensure there are quality places and spaces in neighbourhoods for community socialising. A number of other policies in the NSP also ensures there are community spaces in Southwark. P34 Town and local centres states that development must ensure the provision of main town centre uses including community, civic, leisure and cultural uses. P56 Open Space supports the provision of open space through not permitting development on Metropolitan Open Land (MOL), Borough Open Land (BOL) and Other Open Space (OOS), other than in defined exceptional circumstances. P58 Green Infrastructure, requires major development to provide green infrastructure, in particular, designed to provide multiple benefits for the health of people and wildlife, including through providing space for community socialising.</p> <p>We will prepare a SOCG to agree the wording that could be included for the suggestion set out as 2a</p>
<p>Mike Wilson NSPPSV495.6</p>	<p>Representation noted. SP5 Healthy, active lives set out a series of policies that will maintain and improve the health and wellbeing of our residents. SP5</p>

"SP5 Healthy, active lives
 "We will maintain and improve the health and wellbeing of our residents ..."
 amend by - add a new numbered statement:
 2a. Providing adequate places and spaces in local neighbourhoods for
 community socialising appropriate for all age groups across the diverse
 communities
 "

is a strategic policy which sets out the council's regeneration strategy to work with local people to improve neighbourhoods and create new opportunities for the future.

P45 Leisure, arts and culture, P46 community Uses seek to retain community and leisure, arts and cultural facilities and increase the provision, ensuring they are 'accessible for all members of the community'. This would ensure there are quality places and spaces in neighbourhoods for community socialising. A number of other policies in the NSP also ensures there are community spaces in Southwark. P34 Town and local centres states that development must ensure the provision of main town centre uses including community, civic, leisure and cultural uses. P56 Open Space supports the provision of open space through not permitting development on Metropolitan Open Land (MOL), Borough Open Land (BOL) and Other Open Space (OOS), other than in defined exceptional circumstances. P58 Green Infrastructure, requires major development to provide green infrastructure, in particular, designed to provide multiple benefits for the health of people and wildlife, including through providing space for community socialising.

Cecilia Cronin
 NSPPSV32.2

" EIP 27B SP5 Healthy Active Lives
 I maintain this policy too is not sound as not justified.
 It claims to be '...improving access to healthcare and community health facilities..'
 Yet in the Elephant and Castle area where I live, the very large Princess Street Group Practice – now part of the Nexus consortium, has for many years been promised a larger, modernised and more functional and accessible site. For a number of years, the council was suggesting the site would be found during the Elephant and Castle Opportunity Area works. Then for the last couple of years, we heard a site would be found in the South Bank University. But now, in the latest amended Site Allocations for the Elephant and Castle area, there

Representation noted. SP5 Healthy, active lives set out a series of policies that will maintain and improve the health and wellbeing of our residents. SP5 is a strategic policy which sets out the council's regeneration strategy to work with local people to improve neighbourhoods and create new opportunities for the future. The council are committed to delivering a Community Health Hub within the Elephant and Castle Area, to support the regeneration of the area. The NSP Site allocations, NSP42, NSP43, NSP44 and NSP45 provide flexibility in the specific location of the Health Hub as development comes forward.

<p>are four references to the possibility that certain developments ‘may’ be able to provide a site for a ‘Community Health Hub’. (Site Allocations NSP 42, 43, 44, 45). Residents here, surrounded for years by a massive amount of ‘regeneration’, can be forgiven I suggest, for doubting it will happen.</p> <p>"</p>	
<p>Friends of Stave NSPPSV520.4, .5</p> <p>Do you consider this policy is sound? - sound NO Do you consider this policy is sound? - why not sound - Effective EFFECTIVE "P44 Healthy developments This Policy is neither effective nor properly thought out as there has been insufficient consideration of the points listed below: This policy, by implication, refers only to built health, community, sport and leisure facilities. Green space and access to green space is not identified as a health related community facility. This Policy does not clearly identify the importance of access to nature in supporting healthy lifestyles and physical/mental well-being. This Policy does not reflect current and existing research that has amply demonstrated access to nature creates healthier communities. This Policy does not support or protect existing neighbourhood green spaces as facilities that enable healthy lifestyles. This Policy does not make clear that green space within walking distance of a Development can be used as a benefit and gain for that Development."</p>	<p>Representation Noted. SP5 Healthy, active lives set out a series of policies that will maintain and improve the health and wellbeing of our residents, including through ‘increasing, protecting and improving green spaces’. It is important to recognise that the NSP should be read as a whole, a number of policies address the benefits of green space in supporting healthy lifestyles, and improving physical and mental wellbeing.</p> <p>The general protection of green spaces is primarily addressed in P56 Open Space, which does not permit development on Metropolitan Open Land (MOL), Borough Open Land (BOL) and Other Open Space (OOS), other than in defined exceptional circumstances. P58 Green Infrastructure, requires major development to provide green infrastructure, in particular, designed to provide multiple benefits for the health of people and wildlife. P64 Air quality, also recognises the importance of urban greening to mitigate the effects of poor air quality. The NSP is positively prepared to ensure that green infrastructure, open space, trees and the wider urban realm contribute to the health and wellbeing of our residents and mitigate the effects of climate change.</p>
<p>NHS London Healthy Urban Development Unit NSPPSV482.1</p> <p>We welcome the additional wording to the policy and reasons. However, while the reasons include ‘our aim to be an age friendly borough’ this is not reflected in the policy. The policy refers to ‘introducing the concept of active design’ which does not require anything of development and should be reworded to be phrased positively. The Council has a stated aim to be ‘An</p>	<p>Representation noted. It is important that the NSP is read as a whole, there are a number of policies which seek to ensure an age-friendly borough. SP2 Regeneration for all, states that development will be designed for the diverse communities in Southwark and to ensure accessibility, inclusivity, and interaction, regardless of disability, age or gender, and allow all to participate equally, confidently and independently in everyday activities. SP3 Best Start in Life, ensures we will give all our young people the best start in life in a</p>

<p>age friendly borough’ which requires a more holistic approach. Evidence of age friendly planning and design is that it is beneficial to all communities and would contribute to the visions set out within the New Southwark Plan and therefore we suggest the policy should be amended as set out below</p>	<p>safe, stable and healthy environment where they have the opportunity to develop, make choices and feel in control of their lives and future. P12 Design of Places address the role of design in making sure development is accessible to all, it states that development must, ‘Provide accessible and inclusive design for all ages and people with disabilities’.</p>
<p>Abby Taubin NSPPSV218.2</p> <p>Not positively prepared, justified or effective. Policy SP5 states that, “All developments must reduce their carbon emissions” (Key Statistics, p12) and that, “Ensuring buildings are energy efficient and low carbon will help reduce our carbon footprint and our contribution to man-made climate change.”</p>	<p>Representation noted. Key statistics states that ‘all developments must reduce their carbon emissions’. It is important that the NSP is read as a whole, SP6 Cleaner, greener, safer states that we will lead the way in providing spaces for people to connect with nature, making people feel safe, creating cleaner streets, increasing recycling and reducing landfill waste, and addressing the Climate Emergency.</p>

Representation	Officer Response
<p data-bbox="188 317 517 347">P44 Healthy Developments</p> <p data-bbox="188 357 432 421">TfL Spatial Planning NSPPSV181.7</p> <p data-bbox="188 464 1070 564">"P44 – Healthy developments The policy should be further amended to better reflect all elements of the Healthy Streets Approach set out in Policy T2 of the ItPLP"</p>	<p data-bbox="1140 392 2063 603">Representation noted. The Healthy Streets Approach, to ‘improve health and reduce health inequalities; reduce car dominance, ownership and use, road danger, severance, vehicle emissions and noise; increase walking, cycling and public transport use; improve street safety, comfort, convenience and amenity; and support these outcomes through sensitively designed freight facilities, is reflected in a number of policies in the NSP.</p> <p data-bbox="1140 644 2063 999">SP5 Healthy, active lives sets out a series of policies that will maintain and improve the health and wellbeing of our residents. SP6 Cleaner, greener, safer sets out that we will make Southwark a place where walking, cycling and public transport are the first choice of travel as they are convenient, safe and attractive. SP5 and SP6 are strategic policies which set out the council’s regeneration strategy to work with local people to improve neighbourhoods and create new opportunities for the future. P12 Design of places, P17 Efficient Use of Land, P48 Public Transport, P49 Highways impacts, P50 Walking, P52 Cycling, P53 Car Parking, P56 Open Space, all reflect elements of the Healthy Streets Approach in the New London Plan.</p>
<p data-bbox="188 1043 338 1107">Eileen Conn NSPPSV56.4</p> <p data-bbox="188 1150 1111 1382">"Suggested changes: P44 Healthy developments page 143 – “Development must - add a new numbered statement on the lines of eg: 4. Identify local provisions for socialising spaces. Where these are inadequate for the locality, new development must contribute adequately to their provision to meet the identified need. "</p>	<p data-bbox="1140 1080 2063 1431">Representation noted. P44 Healthy developments states that development will be permitted where it provides new health, community, sport and leisure facilities. P45 Leisure, arts and culture, P46 community Uses seek to retain community and leisure, arts and cultural facilities and increase the provision, ensuring they are ‘accessible for all members of the community’. This would ensure there are quality places and spaces in neighbourhoods for community socialising. A number of other policies in the NSP also ensures there are community spaces in Southwark. P34 Town and local centres states that development must ensure the provision of main town centre uses including community, civic, leisure and cultural uses. P56 Open Space supports the</p>

	<p>provision of open space through not permitting development on Metropolitan Open Land (MOL), Borough Open Land (BOL) and Other Open Space (OOS), other than in defined exceptional circumstances. P58 Green Infrastructure, requires major development to provide green infrastructure, in particular, designed to provide multiple benefits for the health of people and wildlife, including through providing space for community socialising.</p> <p>The Integrated Impact Assessment (IIA) sets out how this plan will be monitored through Baseline Indicators, see Appendix 3: Baseline Data. For example, Number of Open Spaces per 1,000 people, Provision of Public Parks per 1,000.</p>
<p>Mike Wilson NSPPSV495.7</p> <p>"P44 Healthy developments "Development must - add a new numbered statement on the lines of eg: 4. Identify local provisions for socialising spaces. Where these are inadequate for the locality, the new development must contribute adequately to their provision to meet the identified need. (How this process can be framed and monitored into terms of good participative practice is something that can be expanded upon at the EiP (as for P46, below)).</p>	<p>Representation noted. P44 Healthy developments states that development will be permitted where it provides new health, community, sport and leisure facilities. P45 Leisure, arts and culture, P46 community Uses seek to retain community and leisure, arts and cultural facilities and increase the provision, ensuring they are 'accessible for all members of the community'. This would ensure there are quality places and spaces in neighbourhoods for community socialising. A number of other policies in the NSP also ensures there are community spaces in Southwark. P34 Town and local centres states that development must ensure the provision of main town centre uses including community, civic, leisure and cultural uses. P56 Open Space supports the provision of open space through not permitting development on Metropolitan Open Land (MOL), Borough Open Land (BOL) and Other Open Space (OOS), other than in defined exceptional circumstances. P58 Green Infrastructure, requires major development to provide green infrastructure, in particular, designed to provide multiple benefits for the health of people and wildlife, including through providing space for community socialising.</p> <p>The Integrated Impact Assessment (IIA) sets out how this plan will be monitored through Baseline Indicators, see Appendix 3: Baseline Data. For</p>

	example, Number of Open Spaces per 1,000 people, Provision of Public Parks per 1,000.
<p>Sport England NSPPSV170.1, .2, .3, .4, .5</p> <p>Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? - legally compliant NO Do you consider this policy is sound? - sound NO Do you consider this policy is sound? - why not sound - Justified JUSTIFIED</p> <p>"Sport England considers that part 2 of Policy P44 where it applies to sports facilities (e.g. swimming pools, sports centres etc.) is not consistent with current government guidance. Paragraph 97 of the National Planning Policy Framework requires all sports facilities to be protected from development. This means that sports facilities should be retained as sports facilities (not lost to other types of community use), they should be protected in the same way that outdoor sports facilities, such as playing fields are protected. Sports facilities can be expensive to run and maintain. They may therefore be put at risk by the 2 year marketing requirement in this policy, as developers may purchase facilities with the intention of fulfilling this requirement to ensure they can realise their asset as a housing development. Redevelopment of sports facilities should only be permitted where a Council led built facilities strategy has concluded that facility is surplus to requirements (first bullet point of Paragraph 97). In London where there is known to be existing shortfalls in built facilities and growing population will increase demand further, it is important to ensure that all sports facilities (whether in public or private ownership) are protected from development for other uses. There are unlikely to be sites in this Borough or adjacent Boroughs available to provide replacement facilities. Sports facilities used by the community require additional protection from</p>	<p>Representation noted. P44 Healthy developments, states that development must retain or re-provide existing health, community, sport and leisure facilities. The NPPF states that, 'Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements'. Point 3 of P44, requires any loss of a sports facility to demonstrate that there are more facilities than needed, through a two year marketing requirement. The site allocations in the NSP also identify where redevelopment must provide D1 and D2 uses, which could include sports facilities.</p>

development."

Sports facilities should not be redeveloped for alternative uses unless an assessment has been undertaken which has clearly shown the buildings to be surplus to requirements OR the facility will be replaced in another location with a facility that is equivalent or better provision in terms of quantity and quality in a suitable location OR the sports facility will be replaced with alternative sports and recreational provision, the needs for which clearly outweigh the loss.'

NHS London Urban Healthy Developments
NSPPSV482.6

"It is unclear why Clause 1.4 has been deleted and we are concerned that its deletion may lead to health and health related community facilities which are identified as needed not being provided This would be contrary to the NPPF and PPG which requires Local Plan's to ensure adequate social infrastructure is provided.

Clause three of this policy should be amended as set out below:

3. In exceptional circumstances, health, community, sport and leisure facilities can be replaced by another use where they are surplus to requirements. there are currently more facilities than needed. This needs to must be demonstrated by a marketing exercise for two years, immediately prior to any planning application or where their loss forms part of an agreed strategy for provision of these facilities to meet borough needs.

This would ensure that the policy is in general conformity with the Mayor's Intent to Publish London Plan social infrastructure policies.

An additional paragraph under 'Reasons' should make reference to the loss of health or other community infrastructure where it forms part of an agreed strategy, for example, SELCCG's strategy for the provision of health services/facilities within the borough.

Representation noted. It is important to recognise that the NSP should be read as a whole. Although the point 1.4 has been removed from P44 Healthy Developments, P34: Town and Local centres states that 'town and local centres should be the main focus of new developments providing new sops, education, healthcare and community facilities'.

IP1 Infrastructure, ensures that physical and social infrastructure supports the needs of residents, including where increases in density have been planned for through the site allocations.

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NHS Property
NSPPSV392

"Policy P44 (Healthy Developments) of the New Southwark Plan Proposed Submission Version allows for the replacement of existing health facilities only in exceptional circumstances. As drafted, it is not felt that Policy P44 is sound, nor does it provide an effective framework for the delivery of healthcare facilities.

As there have been no changes made to the submission version of the Local Plan, we maintain that there has been no consideration of NHS estate rationalisation programmes carried out by public service providers. It is important that public service estate rationalisation programmes are considered when assessing policies that seek to manage healthcare uses. NHS estate reviews are aimed at improving the provision of healthcare services by increasing efficiencies, including through the disposal or development of unneeded and underutilised properties. This means that capital receipts from disposals for best value, as well as revenue spending that is saved, can be used to improve facilities and services.

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Unfortunately, the policy is not positively prepared, is overly restrictive and as worded, would have a negative impact on the ability of the NHS and Council to deliver services locally. Restrictive policies, especially those which require substantial periods of marketing, could prevent or delay required investment in new/improved services and facilities. It is not therefore felt the policy is in accordance with national planning policy.

Representation noted. P44 Healthy developments states that development will be permitted where it provides new health, community, sport and leisure facilities. Point 3 of P44, requires any loss of a sports facility to demonstrate that there are surplus to requirements, through a two year marketing requirement. SP5 Healthy, active lives set out a series of policies that will maintain and improve the health and wellbeing of our residents. SP5 is a strategic policy which sets out the council's regeneration strategy to work with local people to improve neighbourhoods and create new opportunities for the future. The council are committed to delivering a new and improved health facilities and services. The NSP Site allocations identify sites where health uses could come forward. Issues relating to the recent changes to the UCO will be addressed through the Examination in Public.

In September 2020, the Use Classes Order was updated. The update changes former D1 and D2 uses to Class F, while health facilities (previously D1) are now considered Class E alongside other retail and high street uses. Considering these changes, P44 as worded can no longer be deemed applicable to health facilities and exception should be made for health uses that now fall within a different use class. Furthermore, it should be noted that health facilities, now a Class E land use, cannot be subject to policy P46 (Community Uses). Therefore, where NHS sites are declared surplus to requirements by NHS commissioners, planning policies should actively seek to support alternative value generating uses to allow for reinvestment in new NHS facilities."

Old Bermondsey Neighbourhood Forum
NSPPSV132.19

"Document EIP 27A Policy: P26 Education Places & 27 Access to Employment and Training. P44 Healthy developments &, P46 Community uses
Not positively prepared, effective or justified
The direction of the wording changes towards access to all members of the community are supported as a vague ambition however it is unclear how this will be achieved and what role design would play in this. Similarly, training and jobs for local people in the construction stage should have more definition and have clear high levels for larger scale developments with cases for financial contributions in place of this provision being subject to rigorous tests - there are many examples where this happens too easily. These policies along with P44 and P46 should be based on an ambitious (and robust) evidence base whereby the council should through genuine research and meaningful local consultation build a detailed and maintainable picture of local need and build up a set of positive precedents of social infrastructure. The relationship between the inside and outside of buildings (and the transitions between) in design terms is especially important given the ambition for mixed use. Is there also a potential opportunity in the current pandemic situation for example for office developments to provide more community space at ground floor?"

Representation noted. It is important to recognise that the NSP should be read as a whole, P12 Design of Places address the role of design in making sure development is accessible to all, it states that development must, 'Provide accessible and inclusive design for all ages and people with disabilities'. SP201 - Infrastructure background paper, sets out our evidence and strategy for the provision of infrastructure, social, health, educational and utilities.

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<p>Ralph Smyth NSPPSV164.2</p> <p>The proposed P44 Healthy developments policy is inadequate as it fails to consider relative accessibility by motor traffic (including Private Hire Vehicles): TfL's Healthy Streets guidance highlights the need to restrict private motor traffic to deliver significant modal shift.</p>	<p>Representation noted. The Healthy Streets Approach, to 'improve health and reduce health inequalities; reduce car dominance, ownership and use, road danger, severance, vehicle emissions and noise; increase walking, cycling and public transport use; improve street safety, comfort, convenience and amenity; and support these outcomes through sensitively designed freight facilities, is reflected in a number of policies in the NSP.</p> <p>SP6 Cleaner, greener, safer sets out that we will make Southwark a place where walking, cycling and public transport are the first choice of travel as they are convenient, safe and attractive. P48 Public Transport, P49 Highways impacts, P50 Walking, P52 Cycling, P53 Car Parking, P56 Open Space, all reflect elements of the Healthy Streets Approach in the New London Plan, in particular delivering a significant modal shift.</p>

Representation	Officer Response
<p>P45 Leisure, arts and culture</p>	
<p>Sports England NSPPSV0160.6, .7, .8, .9</p> <p>Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? - legally compliant NO</p> <p>Do you consider this policy is sound? - sound NO</p> <p>Do you consider this policy is sound? - why not sound - Justified JUSTIFIED</p> <p>Please see Sport England’s comments in relation to Policy P44. Sport England is concerned that policies P43 and P44 do not give sufficient protection to all sports facilities in the Borough, as allowed for currently in the National Planning Policy Framework.</p>	<p>Representation noted. P44 Healthy developments, states that development must retain or re-provide existing health, community, sport and leisure facilities. The NPPF states that, ‘Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements’. Point 3 of P44, requires any loss of a sports facility to demonstrate that there are more facilities than needed, through a two year marketing requirement. The site allocations in the NSP also identify where redevelopment must provide D1 and D2 uses, which could include sports facilities.</p>

Representation	Officer Response
<p data-bbox="188 316 443 344">P46 Community uses</p> <p data-bbox="188 355 533 419">Guys and St Thomas Charity NSPPSV76.6</p> <p data-bbox="188 464 452 493">"Community Facilities</p> <p data-bbox="188 501 1099 707">As a significant healthcare provider of both acute and general medicine, the Trust can demonstrate the realities of providing infrastructure in the Borough, to meet the diverse local needs. Wording within the Plan should address this need for flexibility and the reality of other uses that are needed to support primary social infrastructure and operations, so that the Plan can be truly effective.</p> <p data-bbox="188 715 1111 995">It is requested that the wording of Draft Policy P46 'Community Facilities' be amended to allow for the change of use of existing community facilities to be replaced by a use included within healthcare services, such as offices, training rooms, residential/staff accommodation and research facilities. It should be acknowledged that some of these changes are now established under the new Use Classes Order regardless. In order to secure long term flexibility for social infrastructure in the Borough, the policy should be amended.</p> <p data-bbox="188 1003 1115 1106">It is also requested that allowance is made in the policy to support the above, by not requiring marketing evidence if the proposal is part of the strategic release of assets by a public health body."</p>	<p data-bbox="1140 424 2067 630">Representation noted. P46 Community uses, provides flexibility in changing community uses, in exceptional circumstances where they are surplus to requirements. It is acknowledged that the recent changes to the UCO have established a greater flexibility within certain uses, including within E. Issues relating to the recent changes to the UCO will be addressed through the Examination in Public.</p>
<p data-bbox="188 1150 510 1214">Department for Education NSPPSV452.2</p> <p data-bbox="188 1259 1097 1431">"We note that there is a restriction on the change of use of community uses which would include social infrastructure and requirement for two years' marketing to release the former use. We would consider that this is too restrictive and could lead to social infrastructure including education uses being unable to be delivered in line with need and demand. It is important</p>	<p data-bbox="1140 1219 2058 1391">Representation noted. P46 Community uses, provides flexibility in changing community uses, in exceptional circumstances where they are surplus to requirements. It is acknowledged that the recent changes to the UCO have established a greater flexibility within certain uses, including within E. Issues relating to the recent changes to the UCO will be addressed through the</p>

that there is flexibility within types of social infrastructure to enable best value for money for public services and agencies delivering these. Such policy requirements can also be challenging to the public sector/third sector organisations required to meet the tests, given the intensity of resource and timescales involved. This places additional burden on such organisation who are already frequently stretched and need to be able to realise value for money and efficiency.

The current policy approach is not sufficiently flexible to allow for the expedient delivery of infrastructure changes. It is also not wholly clear on the scope of the change of use permitted.

We would therefore propose the following changes to the policy text:

2. In exceptional circumstances community facilities can be replaced by another non-community use where they are surplus to requirements. This would be justified by:

- a) a marketing exercise for two years immediately prior to any planning application, for both its existing condition and as an opportunity for an improved community facility at market rates; or
- b) evidence and justification that the site is not suitable or required for continued use or alternative community use, due to its location, condition or site context.

9. This would then ensure the most efficient use of sites in the borough.

10. Part 3 of the policy does not wholly comply with the NPPF in relation to school place provision. The NPPF (at paragraph 94) requires that: 'a sufficient choice of school places is available to meet the needs of existing and new communities... [to] widen choice in education.'

11. Therefore, we consider that the following amendment is required to the policy text to ensure consistency with the NPPF, positive planning to ensure that the ability for schools to be delivered to maximise choice, attainment and aspiration in Southwark. This is in recognition that in some instances, schools will be located to serve the catchment they are required to meet, which may not therefore be needed to be accessible by 'all members of the community'.

12. Furthermore, the London Plan Intend to Publish version (December 2019)

Examination in Public.

clarifies this at Policy S3 part B 2), requiring that education facilities be located in accessible locations, with good public transport accessibility and access by walking and cycling.

13. In addition to this, the references to D1 use class should be replaced with Class E, due to the changes made to the Use Classes Order in 2020.

14. We would therefore propose the following changes to the policy text:

3. Development will be permitted where:

1. New community facilities are provided (Use Class E D1, D2 and Sui Generis) that are accessible for all members of the community that it is intended to serve.

"

Old Bermondsey Neighbourhood Forum
NSPPSV132.20

"Document EIP 27A Policy: P26 Education Places & 27 Access to Employment and Training. P44 Healthy developments &, P46 Community uses
Not positively prepared, effective or justified

The direction of the wording changes towards access to all members of the community are supported as a vague ambition however it is unclear how this will be achieved and what role design would play in this. Similarly, training and jobs for local people in the construction stage should have more definition and have clear high levels for larger scale developments with cases for financial contributions in place of this provision being subject to rigorous tests - there are many examples where this happens too easily. These policies along with P44 and P46 should be based on an ambitious (and robust) evidence base whereby the council should through genuine research and meaningful local consultation build a detailed and maintainable picture of local need and build up a set of positive precedents of social infrastructure. The relationship between the inside and outside of buildings (and the transitions between) in design terms is especially important given the ambition for mixed use. Is there also a potential opportunity in the current pandemic situation for example for office developments to provide more community space at ground floor?

Representation noted. It is important to recognise that the NSP should be read as a whole, P12 Design of Places address the role of design in making sure development is accessible to all, it states that development must, 'Provide accessible and inclusive design for all ages and people with disabilities'. SP201 - Infrastructure background paper, sets out our evidence and strategy for the provision of infrastructure, social, health, educational and utilities.

"	
<p>Living Bankside NSPPSV239.16</p> <p>"Community Uses The policy should state that Southwark seeks to encourage community uses in every development to ensure adequate social infrastructure. There is a lack of social infrastructure in areas with large numbers of residents and businesses. This is contradictory to 'regeneration for all' as many residents feel isolated in an oasis of businesses – community uses with support from applicants enables sense of belonging and pride of place. This improves mental health."</p>	<p>Representation noted. P46 community Uses seeks to retain community and leisure, arts and cultural facilities and increase the provision, ensuring they are 'accessible for all members of the community'. This would ensure there are quality places and spaces in neighbourhoods for community use. A number of other policies in the NSP also ensures there are community spaces in Southwark. P34 Town and local centres states that development must ensure the provision of main town centre uses including community, civic, leisure and cultural uses. P56 Open Space supports the provision of open space through not permitting development on Metropolitan Open Land (MOL), Borough Open Land (BOL) and Other Open Space (OOS), other than in defined exceptional circumstances. P58 Green Infrastructure, requires major development to provide green infrastructure, in particular, designed to provide multiple benefits for the health of people and wildlife, including through providing space for community socialising.</p>
<p>Eileen Conn NSPPSV56.5</p> <p>"Suggested changes: P46 Community Uses page 145 – "Development must: add a new numbered statement on the lines of eg: 3. Identify local provisions for premises for community uses. Where these are inadequate for the locality and there is an identified need, new development must contribute adequately to their provision."</p>	<p>Representation noted. P46 community Uses seeks to retain community and leisure, arts and cultural facilities and increase the provision, ensuring they are 'accessible for all members of the community'. This would ensure there are quality places and spaces in neighbourhoods for community use. A number of other policies in the NSP also ensures there are community spaces in Southwark. P34 Town and local centres states that development must ensure the provision of main town centre uses including community, civic, leisure and cultural uses. P56 Open Space supports the provision of open space through not permitting development on Metropolitan Open Land (MOL), Borough Open Land (BOL) and Other Open Space (OOS), other than in defined exceptional circumstances. P58 Green Infrastructure, requires major development to provide green infrastructure, in particular, designed to provide multiple benefits for the health of people and wildlife, including</p>

	through providing space for community socialising.
<p>Mike Wilson NSPPSV495.8</p> <p>"P46 Community Uses "Development must: add new numbered statements on the lines of eg: 3. Retain existing community facilities. Where this is not possible, replacement facilities must be provided as part of new developments provided the replacement is an enhanced community facility" 4. Identify local provisions for premises for social and community uses. Where these are inadequate for the locality and there is an identified need, the new development must contribute adequately to their provision. "</p>	<p>Representation noted. P46 community Uses seeks to retain community and leisure, arts and cultural facilities and increase the provision, ensuring they are 'accessible for all members of the community'. This would ensure there are quality places and spaces in neighbourhoods for community use. A number of other policies in the NSP also ensures there are community spaces in Southwark. P34 Town and local centres states that development must ensure the provision of main town centre uses including community, civic, leisure and cultural uses. P56 Open Space supports the provision of open space through not permitting development on Metropolitan Open Land (MOL), Borough Open Land (BOL) and Other Open Space (OOS), other than in defined exceptional circumstances. P58 Green Infrastructure, requires major development to provide green infrastructure, in particular, designed to provide multiple benefits for the health of people and wildlife, including through providing space for community socialising.</p>
<p>Sports England NSPPSV170.9</p> <p>Please see Sport England's comments in relation to Policy P44. Sport England is concerned that policies P43 and P44 do not give sufficient protection to all sports facilities in the Borough, as allowed for currently in the National Planning Policy Framework.</p>	<p>Representation noted. P44 Healthy developments, states that development must retain or re-provide existing health, community, sport and leisure facilities. The NPPF states that, 'Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <p>a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements'. Point 3 of P44, would require any loss of a sports facility to demonstrate that there are more facilities than needed, through a two year marketing requirement. The site allocations in the NSP also identify where redevelopment must provide D1 and D2 uses, which could include sports facilities.</p>

Representation	Officer Response
<p>P48 Public transport</p>	
<p>Steve Lancashire NSPPSV172.3</p> <p>There is no evidence that the policies outlined have taken sufficient account of the impact of the pandemic on public transport, walking and cycling behaviours and routes. All cycling and walking networks should be reviewed and evidence produced about their effectiveness.</p>	<p>The Council has carried out a review of the pandemic on movement and this is published on the website. All networks have been reviewed as part of this process.</p>

Representation	Officer Response
P49 Highways impact	
<p>Ralph Smith NSPPSV164.3</p> <p>P49 highways impacts fails to plan for reductions in motor traffic in line with the Mayor's Transport Strategy or to radically reduce emissions in line with the net zero target.</p>	<p>P49 clearly states that development must 'minimise the demand for private car journeys'</p>

Representation	Officer Response
<p data-bbox="188 316 340 347">P50 Walking</p> <p data-bbox="188 355 365 419">John Bussey NSPPSV373.10</p> <p data-bbox="188 464 378 491">"P50: WALKING Not Effective</p> <p data-bbox="188 536 1090 890">I support this policy (and the growth in cycling) but the greatest danger and disincentive to walking now comes from cyclists and motorised scooters rather than vehicles. It really must be emphasised and made clear that pavements are for pedestrians, as that is the only way pedestrians can be safe. You cannot hear cyclists or motorised scooters coming up behind you and they can appear from any direction which is so dangerous. A walk in the park also becomes more stressful when cyclists are in a race to get to work whether or not there is supposed to be pedestrian priority. This policy needs to be made more effective. Alternative - The policy needs to be strengthened to protect pedestrians."</p>	<p data-bbox="1140 424 1411 451">Representation noted.</p> <p data-bbox="1140 493 2029 628">The policy in conjunction with the Movement Plan, adopted 2019, sets out the need to improve walking and cycling routes to promote more active travel and healthier lifestyles. It recognises that safety is a key barrier to active travel, and aims to resolve it.</p>
<p data-bbox="188 900 389 963">Steve Lancashire NSPPSV172.4</p> <p data-bbox="188 1008 1095 1144">There is no evidence that the policies outlined have taken sufficient account of the impact of the pandemic on public transport, walking and cycling behaviours and routes. All cycling and walking networks should be reviewed and evidence produced about their effectiveness.</p>	<p data-bbox="1140 1035 2049 1136">The Council has carried out a review of the pandemic on movement and this is published on the website. All networks have been reviewed as part of this process.</p>
<p data-bbox="188 1225 396 1289">Caroline Courtois NSPPSV496.2</p> <p data-bbox="188 1334 1099 1434">Fourthly, I noted the effort to ensure that the cycle routes would be extended and that road flow would be improved - such as on Jamaica road. I am disappointed that similar efforts are not put into ensuring the pedestrian</p>	<p data-bbox="1140 1230 1411 1257">Representation noted.</p> <p data-bbox="1140 1299 2029 1399">The policy in conjunction with the Movement Plan, adopted 2019, sets out the need to improve walking and cycling routes to promote more active travel and healthier lifestyles. It recognises that safety is a key barrier to</p>

paths are maintained, improved and kept safe (which includes but is not limited to provided sufficiently large paths, levelled pavements avoiding potential falls for elderlies and vulnerable residents, as well as providing sufficient safe crossings).

active travel, and aims to resolve it.

Representation	Officer Response
<p data-bbox="188 320 432 347">P51 Low Line routes</p> <p data-bbox="188 360 443 421">Team London Bridge NSPPSV179.3</p> <p data-bbox="188 467 840 494">We welcome the additional emphasis on the Low Line.</p>	<p data-bbox="1140 467 1323 494">Support noted.</p>
<p data-bbox="188 579 432 639">TfL Spatial Planning NSPPSV181.8</p> <p data-bbox="188 686 1095 857">"P51 – Low Line routes TfL supports the implementation of Low Line routes, however, the policy wording here and in other policies/site allocations should make explicit that the Low Line is also designed for cycling and should cater for cyclists throughout."</p>	<p data-bbox="1140 647 2056 794">The focus on the low line is a walking route and therefore we will not add reference to encouraging cycling on the low line. We have a number of cycleways in the borough which are identified on the vision and the site allocations maps.</p>

Representation	Officer Response
<p data-bbox="181 312 331 347">P52 Cycling</p> <p data-bbox="181 352 584 421">ROK Planning on behalf of Unite NSPPSV198.4</p> <p data-bbox="181 459 896 1430">"Part 2 of policy P52 requires cycle parking to be delivered at a level of 1 space per bedroom for student accommodation and co-living development (Sui generis). Unite object to this requirement for the following reasons: 1. The standards are not compliant with the draft London Plan which requires only 0.75 spaces per bedroom. In any case, this standard itself is still considered unnecessary given the additional reasons set out below; 2. Unite's experience has shown that cycle parking provision provided at policy complaint levels is severely underused. Enclosed within Appendix A (Representations to Draft New London Plan - WSP) is supporting evidence which refers to a survey (February 2018) undertaken by Unite to understand the present uptake of cycle utilisation across their student accommodation sites. The study demonstrates that the maximum average demand for cycle parking storage is 5% of bed places, which has been found across the 26 of Unite' sites which equates to a demand of one cycle space per 20 students; 3. This over-provision of unnecessary cycle space can lead to loss of valuable floorspace in which more bedrooms can be provided, thus reducing the efficiency of the use of the land. By way of an example, Unite were required to provide a minimum of 423 cycle spaces for a student scheme in the London Borough of Islington which translates to a floor</p>	<p data-bbox="907 421 1220 456">Representation is noted.</p> <p data-bbox="907 491 2078 600">This policy is adequate in its current form and any suitable alternative cycle parking facilities will be considered at the planning stage. Paragraph 3 of this policy already includes the phrase "conveniently located and accessible".</p>

area of approximately 465 sqm or 385 sqm based on the typical requirements of 1.1sq.m for a Sheffield stand or 0.91sq.m for a dualstacking system respectively. Based on an average student cluster bedroom size of approximately 11sq.m, this would result in the unnecessary loss of approximately 35-42 bedroom units;

4. Additionally, it has been demonstrated that an increase in the provision of cycle parking for student accommodation would not directly result in an increase in cycling patterns amongst students. Firstly, student housing schemes are generally in close proximity to places of study, allowing the majority of journeys to be undertaken on foot. Furthermore, they are in areas with high levels of public transport accessibility providing an alternative means of transport. Additionally, the influence and take up of Cycle hire schemes provide an affordable means of transport, precluding the requirement for private cycle ownership and storage which eliminates the need for students to invest in safety, security and maintenance associated with private ownership; and

5. Finally, student housing and co-living accommodation is developed at higher densities than conventional housing. As a consequence, and in order to provide the required levels of cycle parking, large areas of floorspace (typically at ground floor level) are lost. These areas could otherwise be used more efficiently and effectively for living space or town centre uses, providing numerous benefits to a scheme including increasing their viability.

Recommendation: Given the above, it is considered that a 25% provision of cycle parking for student housing should be required.

"

Friends of Burgess Park
NSPPSV62.1

"Southwark Spine cycle route map Page 155, the map is indicative and illustrative. This needs to be clarified and the more detailed map in the cycling policy documentation updated.

The Cycling Strategy 2015 (SP507) is used as the evidence base. This includes the map for the Southwark Spine, it shows Wells Way as an alternative route; a dotted line, with a route through Burgess Park. This map has been reproduced throughout various documents for cycle routes which reference the Southwark Spine.

Friends of Burgess Park campaigned for the alternative route along Wells Way and is opposed to the route through Burgess Park.

This was posted on the Southwark website in Dec 2019 re the Southwark Spine.

<https://www.southwark.gov.uk/transport-and-roads/active-travel/cycling/cycle-improvements?chapter=3> [Note this is called active travel.]

""On residential streets, traffic will be heavily calmed or designed out. The route passes through Burgess Park where a new greenway will be carefully designed as part of the new park masterplan. An alternative route will also be provided around the park, while other existing routes through the park are being replaced by parallel on road routes wherever possible."

We have now realised that the subsequent reproduction of the map as a council policy document does not adequately show that Wells Way is the preferred route along with an orbital route.

The Cycle Strategy 2015 provided an indicative and illustrative map for the Southwark Spine that allows the route to be updated and developed "wherever possible". This allows the council to respond to new opportunities, for example from new developments.

A new updated map is needed with Wells Way as a route (not a dotted line), and additional routes around the park as desirable. Preferably the detailed map 2015 in the cycling strategy needs to be updated to show Wells Way as the preferred route"

Helen
NSPPSV422.1

"It is impossible to reply to the planning consultation document on the forms you have provided. The forms are far too detailed, and require far too much prior knowledge. It is a recipe for non response. So rather than fill in the extraordinarily detailed and unnecessary comments you require, I am going to make one response, in this email. My main concern is that as an elderly cyclist, the cycling-transport plan is totally inadequate and discriminates against the young and elderly. You say you want to cater for all ages, but you propose to do this through support and training rather than systemic change. In those countries like the Netherlands where they have successful cycling policies - successful because all ages, especially the elderly, use bikes - cycling is off-road. As a cyclist, unless you are young and fit and agile, you cannot share the road with cars, unless you are very brave or very stupid. It is simply a fact, borne out by the cycling profiles in various countries. Unless you plan adequately for substantive off-road cycling, it is just tinkering, and cycling will remain the discriminatory form of transport it currently is, that is excluding the elderly and the very young, arguably the people who need most of all to cycle.

Representation noted.

This policy in conjunction with Policy P12 is adequate and any other cycling-related issues will be considered at the planning stage. The Movement Plan, adopted 2019, sets out the need to improve walking and cycling routes to promote more active travel and healthier lifestyles. It recognises that safety is a key barrier to active travel, and aims to resolve it.

<p>I hope you can revise the plan accordingly rather than more tinkering at the margins that will take years. As a life-long Southwark cyclist, it would be good to see a change before I die or give up cycling altogether. In so far as I can read it, this plan does not give me much hope. I hope you will be able to include this response in your report to inspectors.</p> <p>"</p>	
<p>Steve Lancashire NSPPSV172.5</p> <p>There is no evidence that the policies outlined have taken sufficient account of the impact of the pandemic on public transport, walking and cycling behaviours and routes. All cycling and walking networks should be reviewed and evidence produced about their effectiveness.</p>	<p>The Council has carried out a review of the pandemic on movement and this is published on the website. All networks have been reviewed as part of this process.</p>
<p>TfL Spatial Planning NSPPSV181.9</p> <p>"P52 – Cycling</p> <p>While some standards in tables 9 and 10 go beyond the London Plan, which we strongly support, some of the proposed standards are now lower than the minimum standards specified in policy T5 and table 10.2 of the ItPLP. These include the standard for 1 bedroom, 2 person dwellings outside PTALs 5 and 6 and standards for all categories of retail. Both tables should be updated to ensure consistency with the ItPLP minimum standards. Further, it should be recognised that T5 also requires compliance with the London Cycle Design Standards (LCDS) and this should be reflected in the NSP to ensure that cycle parking meets at least minimum qualitative as well as quantitative standards."</p>	<p>The London Plan and the New Southwark Plan are the Development Plan. The New Southwark Plan has to be in general conformity with the London Plan. The tables could be updated to ensure the tables are consistent if the Inspector considered this appropriate.</p> <p>Design standards are more appropriate in SPD and the LCDS will be used in planning decisions and will form SPD preparation set out in the LDS.</p>

<p>The Camberwell Identity Group NSPPSV472.7</p> <p>"P52 Cycling Not positively prepared or effective. It is not clear what is meant by Spine cycle route. If this is LCN23, there have already been discussions with the Council regarding alterations to this route to avoid Graces Mews / Wilson Road. There is no mention of CS5. Is this to be enhanced, particularly at Camberwell Green? Although cycling is to be encouraged there is no mention of introducing new routes. Policy objection I do not consider this policy sound because it is not positively prepared or effective "</p>	<p>As noted above, the council is developing its cycle routes according to new opportunities and then updating them on the transport layer on Southwark Maps. https://geo.southwark.gov.uk/connect/analyst/mobile/#/main?mapcfg=Transport Cycle Superhighways usually run on TfL roads and so they are responsible for progressing their design. TfL is in the early stages of investigating the design for CS5 with the council.</p>
<p>Ralph Smith NSPPSV164.4</p> <p>Policy P52 is inadequate for failing to set out the wider cycle network or locations for cycle hire stations, both of which are largely unfunded.</p>	<p>This policy is adequate in its current form in conjunction with the Transport Map and Area Vision Maps which sets out cycle routes throughout the borough</p>
<p>Caroline Courtois NSPPSV296.3</p> <p>Fourthly, I noted the effort to ensure that the cycle routes would be extended and that road flow would be improved - such as on Jamaica road. I am disappointed that similar efforts are not put into ensuring the pedestrian paths are maintained, improved and kept safe (which includes but is not limited to provided sufficiently large paths, levelled pavements avoiding potential falls for elderlies and vulnerable residents, as well as providing sufficient safe crossings).</p>	<p>The council's Highways department has a programme of street maintenance for its pavements. Highways also have a programme of street improvements through which it always aims to improve pavements and crossings for pedestrians and cyclists, wherever possible. This work includes particular emphasis on reducing the potential for trips and falls on our pavements.</p>

Representation	Officer Response
<p data-bbox="188 253 331 284">P53 Parking</p> <p data-bbox="188 293 394 357">Steve Lancashire NSPPSV172.6</p> <p data-bbox="188 400 1084 539">Car parking needs much stronger statements given the way incoming residents of the new developments are around the Elephant and Castle are manging to get parking permits for on street parking. What does a car free development actually mean?</p>	<p data-bbox="1140 360 1774 391">P53 is in line national and regional parking standards.</p>
<p data-bbox="188 624 427 687">TfL Spatial Planning NSPPSV181.10</p> <p data-bbox="188 727 412 758">"P53 – Car parking</p> <p data-bbox="188 764 1111 1082">TfL welcomes the minor wording changes that provide clarification. However, as noted above, the submission version of the NSP was published in October 2017. Since then, the new London Plan has reached an advanced stage of its adoption process with an Intend to Publish version (ItPLP) issued in December 2019 and directions from the Secretary of State received in March 2020. This means that the new London Plan is now likely to be adopted before the conclusion of the NSP Examination in Public (EiP) Hearings. With these timescales in mind we would want to avoid any conflict in policies between the two documents.</p> <p data-bbox="188 1088 1039 1227">Proceeding with the residential and retail standards within this policy, without further amendments, risks creating inconsistency with the new London Plan, prompting confusion for developers and raising issues of conformity.</p> <p data-bbox="188 1233 1088 1369">To address this, we have agreed with LB Southwark in our Statement of Common Ground that the NSP parking standards must be brought into line with the ItPLP at the earliest opportunity. Our position is that that there is still an opportunity to make changes to the policy through this plan process</p>	<p data-bbox="1140 687 1998 751">As set out in the SOCG LB Southwark will be reconsidered at the earliest opportunity and the Inspector may direct an amendment if appropriate.</p>

and we intend to address this issue in submissions to the forthcoming EIP. If changes to the policy are not made before the EIP Hearings, it is imperative that the Plan contains a firm commitment to revise parking standards to bring them into line with the London Plan as soon as possible and for clarification to be provided that in the interim period, where there is any conflict between the two documents, London Plan parking standards should take precedence.

Specifically, our areas of concern are:

- Proposed residential parking standards set out in table 11 for areas of PTAL 4, Aylesbury Action Area, Old Kent Road Opportunity Area, Canada Water core/town centre and PTAL 1 or 2 (suburban south) do not reflect the overall approach of Policy T6.1 or the accompanying standards in the ItPLP. In all the above areas the proposed standard is higher than would be permitted by maximum ItPLP standards for all or part of the designated area. The cumulative effect of permitting all this additional car parking could undermine implementation of the London Plan, in particular the achievement of challenging mode share targets set by the Mayor that Southwark has agreed to, as part of their approved Local Implementation Plan. It should also be noted that the planning permission for Canada Water¹ stipulates that the residential development must be car-free, in accordance with the ItPLP. This should be reflected in the NSP.
 - Retail parking standards set out in table 12 do not reflect the overall approach of Policy T6.3 or the accompanying maximum parking standards in the ItPLP and risk over-provision. It is not clear why they only apply to town centres because retail development proposals (including redevelopment of existing out of centre stores) are still put forward for new or reconfigured retail stores outside defined town centres. Retail parking standards should apply to all areas and be in accordance with the maximum standards in the ItPLP.
- "

"I object to the residential parking levels proposed in the New Southwark Plan Policy P53 Car Parking and the detail set out in Table 11: Residential car parking standards.

Policy objection

I do not believe that these are justified in the light of the Southwark Council's declaration of a Climate Emergency for Southwark to become carbon-neutral by 2030 and that they are a barrier to the NSP being effective in delivering this ambition and its other objectives. There are a number of London boroughs such as Camden and Hackney which have a policy of zero parking in relation to any consented development. I assert that Southwark too should adopt a policy of zero residential parking in order to meet other NSP objectives of all developments reducing their carbon emissions and improving transport. I assert that in particular that the maximum car parking provision for the Aylesbury Action Area of 0.4 spaces per home is excessive and given the extremely long duration of this redevelopment, greater focus should be given to improving PTAL levels in this area to ensure high quality access on foot, by bicycle and on public transport rather than granting these high levels of parking which will have a significantly detrimental impact on both the quality of the street environment and fail to enable more walking and cycling.

I would argue too that, outside the suburban south, where PTAL levels are below 5 with the exception of parking for people with disabilities, no parking should be permitted in new developments. Again, work should be undertaken through the delivery of the Movement Plan and through improvements through CIL to increase PTAL levels in those areas to a point where travel on foot, by cycle and by public transport are sufficiently attractive that car ownership is not required."

"I propose that with the exception of the Suburban South and provision for people with disabilities, Table 11 should be adjusted to demonstrate that

Representation noted.

P53 is in line national and regional parking standards.

The recently adopted Movement Plan is prioritising pedestrian and sustainable modes of transport. This is supported by P50, P51 and P52.

As a council, we have declared a Climate Emergency and set a target to meet net carbon zero as a borough by 2030. Policies in the NSP will be reviewed in the context of this target.

residential car parking will not be consented for any new residential development in Southwark. To mitigate this, provision will need to be made through CIL/S106 agreements to ensure increases in PTAL levels where public transport access is currently inadequate in an area, that the quality of cycle provision is improved (this could be included in the PTAL calculation) and the other mitigation measures occur such as the provision of electric car club places and spaces in the local area. In relation to the Suburban South, the proposed levels of parking should be reduced significantly from the proposed 1 maximum space per home."

Jeremy Leach on behalf of Southwark Living Streets
NSPPSV510.2

"Do you consider this policy is sound? - why not sound - Justified
Do you consider this policy is sound? - why not sound - Effective
Do you consider this policy is sound? - why not sound - Positively Prepared
Southwark Living Streets objects to the residential parking levels proposed in the New Southwark Plan Policy P53 Car Parking and the detail set out in Table 11: Residential car parking standards. We do not believe that these are justified in the light of the Southwark Council declaration of a Climate Emergency for Southwark to become carbon-neutral by 2030 and that they are a barrier to the NSP being effective in delivering this ambition and its other objectives. There are a number of London boroughs such as Camden and Hackney which have a policy of zero parking in relation to any consented development. We assert that Southwark too should adopt a policy of zero residential parking in order to meet other NSP objectives of all developments reducing their carbon emissions and improving transport. We assert that in particular that the maximum car parking provision for the Aylesbury Action Area of 0.4 spaces per home is excessive and given the extremely long duration of this redevelopment, greater focus should be given to improving PTAL levels in this area to ensure high quality access on foot, by bicycle and on public transport rather than granting these high levels of parking which will have a significantly detrimental impact on both the quality of the street

Representation noted.

P53 is in line national and regional parking standards.

The recently adopted Movement Plan is prioritising pedestrian and sustainable modes of transport. This is supported by P50, P51 and P52.

As a council, we have declared a Climate Emergency and set a target to meet net carbon zero as a borough by 2030. Policies in the NSP will be reviewed in the context of this target.

environment and fail to enable more walking and cycling.
 We would argue too that, outside the suburban south, where PTAL levels are below 5 with the exception of parking for people with disabilities, no parking should be permitted in new developments. Again, work should be undertaken through the delivery of the Movement Plan and through improvements through CIL to increase PTAL levels in those areas to a point where travel on foot, by cycle and by public transport are sufficiently attractive that car ownership is not required.
 We propose that with the exception of the Suburban South and provision for people with disabilities, Table 11 should be adjusted to demonstrate that residential car parking will not be consented for any new residential development in Southwark. To mitigate this, provision will need to be made through CIL/S106 agreements to ensure increases in PTAL levels where public transport access is currently inadequate in an area, that the quality of cycle provision is improved (this could be included in the PTAL calculation) and the other mitigation measures occur such as the provision of electric car club places and spaces in the local area. In relation to the Suburban South, the proposed levels of parking should be reduced significantly from the proposed 1 maximum space per home."

Jeremy Leach
 NSPPSV510.2

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