

Representation	Officer Response
<p data-bbox="185 316 573 343">AV13 Old Kent Road Area Vision</p> <p data-bbox="185 355 353 419">John Bussy NSPPSV373.5</p> <p data-bbox="185 464 1108 922">AV13: OLD KENT ROAD AREA VISION Not Justified, Not Effective & Not Positively Prepared “Development will be phased based on the commitment and delivery of the Bakerloo Line extension.” Improving the Old Kent Road should never have been dependent on the Bakerloo Line Extension which now appears to be many more decades away. Development should be small scale, achievable and in keeping with the existing rather than the megalomaniac proposals currently being given permission only to cause decades of blight. The current Old Kent Road policies will destroy existing communities (eg around Pages Walk) and not replace anything while the Bakerloo Line Extension is stalled. Start again with a down to earth Area Vision for the Old Kent Road, growing from what is there at the moment and not dependent on the Bakerloo Line Extension.</p>	<p data-bbox="1137 464 2040 564">To achieve the borough’s housing target, enough sites need to be identified to deliver housing. The delivery of the Bakerloo Line Extension will increase the delivery of homes in the Opportunity Area to 20,000.</p> <p data-bbox="1137 608 2063 852">Any development that is brought forward in this area will be assessed against the development management policies outlined in the plan e.g. Policy P12: design of places, P13: design quality, P19: conservation areas, P55 protection of amenity, and the detailed design guidance in the draft Old Kent Road AAP. This considers design quality, the impact a development may have on the local heritage assets and the impact it could have on the existing community in terms of amenity.</p>
<p data-bbox="185 970 427 1034">TfL Spatial Planning NSPPSV181.5</p> <p data-bbox="185 1078 1115 1393">CPC048 - Old Kent Road Area Vision TfL welcomes added references to the planned phasing of development on the Old Kent Road. We have agreed with you previously the Phase 1 9500 cap suggested in terms of transport capacity. We suggest that the 2023 date is omitted given the BLE programme and the build out of especially the big sites and instead the wording is revised to read ‘From 2018 it is anticipated that up to 9,500 homes can be approved with enhancements to the existing public transport network and active travel, prior to the letting of the construction contract for the Bakerloo line extension’</p>	<p data-bbox="1137 1078 2047 1142">2018-2023 reflects the delivery of our five year housing land supply, and the dates reflect likely approvals of planning applications in this period.</p>

Steve Lancashire
NSPPSV172.7

Given the uncertainty surrounding the development of the Bakerloo Line the Plan needs to be revisited to take account of this with particular reference to development sites along the Old Kent Road.

The delivery of the homes on the Old Kent Road is phased based on key milestones with the Bakerloo Line project.

William Pearce
NSPPSV460.2

The proposed Old Kent Road Plan pays lip-service to the fears of local people that they are about to be encased in a dystopian, glass cityscape by staggering the rate of incline away from existing homes. However, early planning proposals that seek to attach themselves to the project seem determined to push the construction of high-rise buildings right up to the doors and windows of the existing residents. A cynic might reach the conclusion that existing Council Taxpayers are being taken for granted or even disregarded, in favour of maximising future tax revenue.

The Old Kent Road Area Action Plan has been updated and has been approved by Cabinet to be published for public consultation in January 2021. This includes an updated Masterplan and updated site allocation for the sub areas.

Representation	Officer Response
<p data-bbox="181 312 477 347">NSP53 Bricklayers Arms</p> <p data-bbox="181 352 398 421">Elizabeth Sinclair NSPPSV353.1</p> <p data-bbox="181 464 488 494">NSP 53: Bricklayers Arms</p> <p data-bbox="181 499 622 529">Not positively prepared nor justified</p> <ol data-bbox="181 534 1111 852" style="list-style-type: none"> 1. Proposal will remove greenspace and trees and impede the useful pedestrian and cycle routes which have been established. 2. Number of homes not designated. 3. A tall building here would block London and Borough views. 4. Has not been chosen by TFL as a Bakerloo Line Extension tube station site so does not feature as a transport/crossing hub which would require a so-called landmark building. 5. Lacks a study of how the traffic would be managed without the flyover and roundabout. 	<p data-bbox="1126 352 1413 383">Representation noted.</p> <p data-bbox="1126 426 2040 493">Point 1: The proposal would improve the pedestrian and cycling environment with additional landscaping as proposed in the site allocation.</p> <p data-bbox="1126 534 2063 852">Point 2: The Bricklayers Arms site is part of the draft Old Kent Road AAP in terms of envisaging significant change to the Opportunity Area over the next 20 years. The flyover is part of the TFL strategic road network and at the moment funding for the project has yet to be identified. The capacity of the site is therefore more uncertain and it has not been included in the calculations for growth in the NSP site allocations capacity figures. However the revised OKR AAP does outline the site could accommodate between 400 and 600 homes depending on the options put forward in the AAP.</p> <p data-bbox="1126 893 2047 1031">Point 3: P16 Tall Buildings provides overarching guidance for taller buildings along with the tall buildings strategy in the Old Kent Road AAP. The London View Management Framework also contributes to protecting important views</p> <p data-bbox="1126 1072 2018 1139">Point 4: The Old Kent Road AAP provides a detailed tall buildings strategy which will set out appropriate locations for tall buildings.</p> <p data-bbox="1126 1181 1995 1284">Point 5: The flyover is part of the TFL strategic road network and at the moment funding for the project has yet to be identified. A traffic study would take place once the project is secured.</p>

Representation	Officer Response
<p data-bbox="181 312 667 347">NSP54 Crimscott Street and Pages Walk</p> <p data-bbox="181 352 371 421">John Bussy NSPPSV373.12</p> <p data-bbox="181 464 1111 852">NSP54: CRIMSCOTT STREET & PAGES WALK Not Effective & Not Positively Prepared Many of the comments above (SP2, P16, & P19) relate to this Site Allocation. It is not positively prepared or effective in so far as developers are treating Pages Walk and Willow Walk as streets to be destroyed in the way they are doing to Crimscott Street. The Site Allocation needs to be rewritten to confirm that any developments on the east side of the top end of Pages Walk and the north side of Willow Walk need to be of height and size to blend in with the existing character and townscape in Pages Walk. This means a limit of 3 storeys or 10m height, on the existing building line. Alternative – As above</p>	<p data-bbox="1126 464 2047 603">The site allocation in the NSP and in the revised OKR AAP considers development impacts and the relationship with Pages Walk Conservation Area and Willow Walk. The plan has been amended incorporating feedback from residents of Pages Walk.</p> <p data-bbox="1126 643 2047 818">The building heights strategy sets out that buildings facing onto Crimscott Street should be between 6 and 8 storeys and buildings onto (the northern end) of Pages Walk up to six storeys with careful consideration given to the surrounding conservation areas and the setting of listed buildings, particularly to the sensitive roof profile along the south of Pages Walk.</p> <p data-bbox="1126 858 2047 962">Development to the immediate rear of Pages Walk has been reduced to 3 storeys, as residential town houses with gardens retaining the existing trees backing onto the Pages Walk rear gardens.</p>
<p data-bbox="181 1007 869 1075">Jo Frost Pages Walk Conservation Residents Association NSPPSV461.3</p> <p data-bbox="181 1115 1111 1291">Whilst the above outlines general concerns of the residents regarding current building and regeneration issues please see below specific comments on the New Southwark Plan. The Pages Walk Conservation Residents Association wish to get Pages Walk and Walk identified specifically to the inspectors as areas of high concern.</p>	<p data-bbox="1126 1115 2047 1254">The revised Old Kent Road AAP masterplan has been changed on the Mandela Way site to address issues raised by residents in the Pages Walk conservation area. The NSP acknowledges that development should enhance the setting of the Pages Walk conservation area.</p> <p data-bbox="1126 1294 2047 1398">The Old Kent Road AAP has now been revised for consultation including revisions to masterplan, building heights and site requirements and we welcome further comments as part of this consultation.</p>

Diana Deacon Pages Walk Conservation Residents Association
NSPPSV463.4

Whilst the above outlines general concerns of the residents regarding current building and regeneration issues please see below specific comments on the New Southwark Plan. The Pages Walk Conservation Residents Association wish to get Pages Walk and Walk identified specifically to the inspectors as areas of high concern.

The revised Old Kent Road AAP masterplan has been changed on the Mandela Way site to address issues raised by residents in the Pages Walk conservation area. The NSP acknowledges that development should enhance the setting of the Pages Walk conservation area.

The Old Kent Road AAP has now been revised for consultation including revisions to masterplan, building heights and site requirements and we welcome further comments as part of this consultation.

Alex Simons
NSPPSV466.1

Height and Distance of any Replacement Buildings

Is it positively prepared? No

Is it effective? No

We have had numerous meetings with planning officers Colin Wilson and Liz Awoyemi since November 2013 regarding the planned redevelopment in the area behind Pages Walk off Mandela Way that backs onto our gardens. We were pleased in December 2019 with a small win when they agreed to change the original plans for the site behind us to be changed to terraced housing with gardens backing on to our existing gardens of Pages Walk. The Pages Walk Conservation Residents Association are pushing for a limit on 2 stories (rather than the planning proposal of a maximum of 3 stories) so that the new development will mirror our Conservation Street Pages Walk which would maintain the integrity and preserve history of the few pockets of heritage that remain in Southwark. We also want the ground level to be preserved as existing - it sits approximately 0.5 meters below the ground level on Pages Walk. The footprint of the new build should be constrained to the existing building footprint and stand no higher than the existing 8.2 meters. Any changes to this will result in a loss of light which will be fiercely opposed by all residents. However, we are concerned that in the new EIP38

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Development to the immediate rear of Pages Walk has been reduced to 3 storeys, as residential town houses with gardens retaining the existing trees backing onto the Pages Walk rear gardens.

The AAP has now been revised for consultation including revisions to masterplan, building heights and site requirements and we welcome further comments as part of this consultation. A number of policies in the New Southwark Plan seek to protect the historic environment in the borough. This includes Policy P19 (conservation areas) and Policy P20 (conservation of the historic environment and natural heritage) which set out that development

Feasibility Study (2018) Page 59 this area has been zoned for a possible 4 story development, this is completely against previous assurances and proposals by Southwark Planning Officers.

We have previously requested an explanation how the Conservation Area principles and objectives of sustaining and enhancing the areas character will be met if the intention is to build 5-6 stories high buildings (and behind that even higher buildings) directly backing the conservation area to the north of the terraced houses. We are also aware that Historic England has expressed concerns about the height of buildings that are directly affecting 'historic rooflines' of the Georgian and Victorian north and south of Old Kent Road and particularly the Pages Walk, Thornburn Square and other Conservation Areas in the area. We were previously assured that buildings would slowly scale up as they move away from Pages Walk but on the new proposal there are areas zoned for 8 storey and even up to 15 storey development in relatively close proximity to Pages Walk. Surely this sits against Southwark Planning principles of sustaining and enhancing Conservation Areas particularly as all existing buildings sit at a maximum of 2 stories in the locality.

Environmental Impact

Residents are also attaching importance for all the existing trees to be preserved as an environmental issue. The existing area of Pages Walk terraced gardens backing on to the landscaped gardens of the proposed area for redevelopment on Mandela Way creates a wildlife corridor and supports a wide range of biodiversity including many types of birds, foxes, squirrels, bees, butterflies and other insects. Living in close proximity to nature is proven to positively enhance health and mental well being. Any destruction of this habitat will have a detrimental affect not only on the environment and well being of residents but will also negatively affect drainage and flooding.

Traffic and Pressure on Road Use

We are also concerned about the impact on roads and traffic that will be

must conserve and enhance the significance of conservation areas and heritage assets and their settings.

Policy P60 requires development to retain and protect significant existing trees including trees designated with Tree Protection Orders, trees that have high amenity value, trees within conservation areas or the curtilage of listed buildings and veteran, ancient and notable trees. In addition, Policy P59 requires development to contribute to net gains biodiversity through including features such as green and brown roofs, green walls, soft landscaping, nest boxes, habitat restoration and expansion, improved green links and buffering existing habitats. Any shortfall in net gains in biodiversity must be secured off site through planning obligations or a financial contribution.

Policy IP3 (community infrastructure levy (CIL) and section 106 obligations) requires proposed development that may result in potential adverse impacts to be offset by using S106 legal agreements. This requires the developer to either offset the impact or pay the council a financial contribution to enable the council to offset the impact. In addition, the council will secure money from the community infrastructure levy to fund the essential infrastructure identified by the council in our Regulation 123 list.

caused by this new development. Pages Walk has been a no through road accessed only from Willow Walk for in excess of 15 years. The road is not wide enough to support 2 way traffic and want assurance that there are no plans to change our quiet residential street. With such a huge development planned for the entire length of Mandela Way how will this be put in place without extreme strain put on Mandela Way and Old Kent Road traffic especially as plans to extend the Bakerloo line have been suspended indefinitely?

Amala Desai
NSPPSV10.8

Policy: NSP54 Crimscott Street and Pages Walk & NSP55 Mandela Way
Positively Prepared: No

These site allocations are not positively prepared or justified because they are unclear, internally inconsistent and because they are not based on robust evidence or on appropriate participation, engagement and consultation.

The maps and text are unclear in that they do not describe in any accuracy an acceptable location or height of tall buildings

The Pages Walk, Crimscott Street and Willow Walk area has always been a low profile area no more than 3 floors except for 1 warehouse building on Willow Walk recessed from the road. Permission has however been given for 9-11 story buildings despite the fact that it is contrary to scale, massing and arrangement and does not respond positively to the existing townscape, character and context. The site allocation must amended to include a height restriction on developments on the north east side of Pages Walk and the western edge of Crimscott Street.

High buildings on Willow Walk and Pages Walk by their very location sitting alongside and behind the Pages Walk Conservation area would loom over and overshadow from the Conservation Area setting and the views in and out of the Conservation Area. Height restrictions will make the Local Plan clear and unambiguous so that it is positive, effective Plan for the Site from the

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Policy IP3 (community infrastructure levy (CIL) and section 106 obligations) requires proposed development that may result in potential adverse impacts

outset.

The site allocations allow for mixed use development even though there are some exclusively residential pockets within the demarcated sites. This does not consider the disturbance and disruption that A and B class (particularly A3 and A4 establishments) cause to residential areas. The amenities of the residents are severely compromised and causes public nuisance and disorder. The dense development proposed on Mandela Way will increase traffic on both Willow Walk and Pages Walk. Pages Walk is closed at the south end to traffic because it was being used as a rat run from Old Kent Road, it was deemed unsafe in a residential area. The scale of development and high-density proposals will exacerbate and disrupt the residential streets and areas in NS54 and NS55.

Effective :No

The use developments on the eastern side of Crismscott Street 'emerging developments' which are in pre-planning stage as a justification for 9 storey buildings on Pages Walk demonstrates the Tall Buildings Policy is not effective.

There is no evidence that genuine alternatives have been considered - despite many alternatives being clearly voiced (previously and currently) by the local community. Similarly to the (related) Tall Buildings Policy) there is a lack of evidence of local capacity having been properly considered, nor of any flexibility for the significant emergent changes now taking place with regards to viability, office, housing and amenity space needs due to the global pandemic

Justified: No

The plans do not consider the changing needs of the London and people who live and work in London in the post Covid landscape. The cost and rentals of both commercial and residential properties are falling fast in Central London. The plans are not evidence based and further investigation is necessary before the Council launches a frenetic building frenzy. The streets area empty and with more people working at home people are seeking open space, a sight of the sky and green space, not a dense built up concrete environment. The quality of life of the residents will be severely damaged on

to be offset by using S106 legal agreements. This requires the developer to either offset the impact or pay the council a financial contribution to enable the council to offset the impact. In addition, the council will secure money from the community infrastructure levy to fund the essential infrastructure identified by the council in our Regulation 123 list.

Consideration will be given to your comments about the impacts of Covid-19

The Old Kent Road AAP has now been revised for consultation including revisions to masterplan, building heights and site requirements and we welcome further comments as part of this consultation. There is still a strong commitment to the Bakerloo Line project.

account of a permanent change in their environment which is not backed by the changed circumstances and uncertain times.

TFL has already backed out of the Bakerloo extension as financially unviable in the present scenario. This was an important consideration in the Council's Development plans. The Plan has been overtaken by circumstances and a fresh view point and approach is necessary to make it meaningful and relevant.

Jeanette Thorne
NSPPSV528

I have peened this email objecting to the proposed Botanical Garden development on Pages Walk. There has been a huge opposition to this development. Please see below for my objections. Design: Is the design in keeping with the area? NO! The design is in no way sympathetic to the existing buildings on Pages Walk. The designers have come up with this design to get around the issue of Right to Light. Basing the design on a long-ago Botanical garden that once sat on the site is absurd. The area in the 1700-1800 was far more rural than today. There is no place for a structure of this design in a low rise, semi industrial and protected residential area. I have shown the design to many residents on my estate, not one person thought it was appropriate. Designing out crime: The design is very open, this may entice would be criminals to break in. This is because as the design is so open and visual to people from the roadside, it could be an opportunist's playground. Tall Buildings: This has to be the primary factor as to why this design should never make it of the planning table. Where on Pages Walk is there any such building which sits right on the kerbside on Pages walk that is over 3 or 4 floors high? There is not! There is no need for a building of this size and design on that particular site. I and my fellow residents are not saying the site does not need developing, it does. The current buildings are an eyesore and currently being used as a drug den. However, it should be acknowledged that many if not most residents would rather deal with this than see the proposed development go ahead, such is the feeling about the

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design. We (the residents) have already submitted a petition calling for the change of height restrictions on pages walk. That petition, collected almost 100 signatures objecting to the then Sultra development. Again, the main concern was the sheer size and mass of the building. At 9 floors high it is just too high. It was just a few years ago that it would have been almost impossible for a developer to come along with such a ludicrous plan. We (the residents) have already submitted a petition calling for the change of height restrictions on pages walk. That petition, collected almost 100 signatures objecting to the then Sultra development. Again, the main concern was the sheer size and mass of the building. At 9 floors high it is just too high. It was just a few years ago that it would have been almost impossible for a developer to come along with such a ludicrous plan.

Pollution: There is already some extensive developments under way on Crinscott Street. The noise and dust from these developments has been very intrusive. During Lockdown I worked from home for the first time in my life. During virtual meetings I was frequently asked what that noise was. It was the sound of the developments on Crimsott. The residents are already living with more noise and pollution from very large developments, why add another so close?

Conservation: Although the section of Pages Walk where the proposed development is to happen, is not a conservation area. The lower part of Pages Walk is. The old railway cottages are within and part of this site. This proposed development will have an impact on this area. The boundaries are too narrow. This has for many, many years been a low rise residential and industrial area. Why can it not still be that? The residents enjoy quite weekends and holidays because the local, small businesses mostly close for these times.

particularly to the sensitive roof profile along the south of Pages Walk.

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Representation	Officer Response
<p data-bbox="188 320 443 347">NSP55 Mandela Way</p> <p data-bbox="188 360 371 421">John Bussy NSPPSV373.13</p> <p data-bbox="188 469 1099 1286"> NSP55: MANDELA WAY Not Justified, Not Effective & Not Positively Prepared EiP38: Mandela Way Dunton Road Feasibility Study is included with the Council's submission documents but what status does it have? Page 94 suggests new 3-storey houses could be built at 22m from the back fences of the Pages Walk Conservation Area houses. This would be preferable to the proposal in the OKR AAP which had workshops and light industry built right up to the back fences. The suggestions for Marcia Road 3-storey houses being 14m back wall to back wall with new 4-storey residential blocks (presumably flats) does not look at all attractive. The 16-storey blocks of flats look similarly unattractive as a way of providing homes. Maybe if 16-storey housing is necessary to provide a park the park is not worth it and decently designed lower rise houses and flats, and no park, would make a much better solution. I cannot believe that the vast amount of development proposed for Mandela will not greatly increase the traffic pressure in Willow Walk and the top end of Pages Walk. The occupants of the 2000 new homes are going to require servicing and transportation, whether or not they are allowed cars. Alternative – Confirm the planning guidance for the backs of existing houses in Pages Walk and re-assess Marcia Road. Re-assess whether the park is worth pushing so many new homes up into the air and away from the ground. Re-assess if 2000 decent new homes are really viable on this site. </p>	<p data-bbox="1140 432 2047 528">The Mandela Way and Dunton Road Feasibility Study is an evidenced based study to inform the New Southwark Plan and the Old Kent Road Area Action Plan.</p> <p data-bbox="1140 576 2058 711">The revised Old Kent Road AAP masterplan has been changed on the Mandela Way site to address issues raised by residents in the Pages Walk conservation area. The NSP acknowledges that development should enhance the setting of the Pages Walk conservation area.</p> <p data-bbox="1140 759 1995 855">The Old Kent Road AAP has now been revised for consultation including revisions to masterplan, building heights and site requirements and we welcome further comments as part of this consultation.</p> <p data-bbox="1140 903 2058 1142">Policy IP3 (community infrastructure levy (CIL) and section 106 obligations) requires proposed development that may result in potential adverse impacts to be offset by using S106 legal agreements. This requires the developer to either offset the impact or pay the council a financial contribution to enable the council to offset the impact. In addition, the council will secure money from the community infrastructure levy to fund the essential infrastructure identified by the council in our Regulation 123 list.</p>
<p data-bbox="188 1334 965 1394">Diana Deacon – pages Walk Conservation Residents Association NSPPSV463.5</p>	<p data-bbox="1140 1406 1966 1431">The revised Old Kent Road AAP masterplan has been changed on the</p>

Site Allocation NSP55: Mandela Way

Height and Distance of any Replacement Buildings

Is it positively prepared? No

Is it effective? No

We have had numerous meetings with planning officers Colin Wilson and Liz Awoyemi since November 2013 regarding the planned redevelopment in the area behind Pages Walk off Mandela Way that backs onto our gardens. We were pleased in December 2019 with a small win when they agreed to change the original plans for the site behind us to be changed to terraced housing with gardens backing on to our existing gardens of Pages Walk. The Pages Walk Conservation Residents Association are pushing for a limit on 2 stories (rather than the planning proposal of a maximum of 3 stories) so that the new development will mirror our Conservation Street Pages Walk which would maintain the integrity and preserve history of the few pockets of heritage that remain in Southwark. We also want the ground level to be preserved as existing - it sits approximately 0.5 meters below the ground level on Pages Walk. The footprint of the new build should be constrained to the existing building footprint and stand no higher than the existing 8.2 meters. Any changes to this will result in a loss of light which will be fiercely opposed by all residents. However, we are concerned that in the new EIP38 Feasibility Study (2018) Page 59 this area has been zoned for a possible 4 story development, this is completely against previous assurances and proposals by Southwark Planning Officers.

We have previously requested an explanation how the Conservation Area principles and objectives of sustaining and enhancing the areas character will be met if the intention is to build 5-6 stories high buildings (and behind that even higher buildings) directly backing the conservation area to the north of the terraced houses. We are also aware that Historic England has expressed concerns about the height of buildings that are directly affecting 'historic rooflines' of the Georgian and Victorian north and south of Old Kent Road and particularly the Pages Walk, Thornburn Square and other Conservation

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Policy P60 requires development to retain and protect significant existing trees including trees designated with Tree Protection Orders, trees that have high amenity value, trees within conservation areas or the curtilage of listed buildings and veteran, ancient and notable trees. In addition, Policy P59 requires development to contribute to net gains biodiversity through including features such as green and brown roofs, green walls, soft landscaping, nest boxes, habitat restoration and expansion, improved green links and buffering existing habitats. Any shortfall in net gains in biodiversity

Areas in the area. We were previously assured that buildings would slowly scale up as they move away from Pages Walk but on the new proposal there are areas zoned for 8 storey and even up to 15 storey development in relatively close proximity to Pages Walk. Surely this sits against Southwark Planning principles of sustaining and enhancing Conservation Areas particularly as all existing buildings sit at a maximum of 2 stories in the locality.

Environmental Impact

Residents are also attaching importance for all the existing trees to be preserved as an environmental issue. The existing area of Pages Walk terraced gardens backing on to the landscaped gardens of the proposed area for redevelopment on Mandela Way creates a wildlife corridor and supports a wide range of biodiversity including many types of birds, foxes, squirrels, bees, butterflies and other insects. Living in close proximity to nature is proven to positively enhance health and mental well being. Any destruction of this habitat will have a detrimental affect not only on the environment and well being of residents but will also negatively affect drainage and flooding.

Traffic and Pressure on Road Use

We are also concerned about the impact on roads and traffic that will be caused by this new development. Pages Walk has been a no through road accessed only from Willow Walk for in excess of 15 years. The road is not wide enough to support 2 way traffic and want assurance that there are no plans to change our quiet residential street. With such a huge development planned for the entire length of Mandela Way how will this be put in place without extreme strain put on Mandela Way and Old Kent Road traffic especially as plans to extend the Bakerloo line have been suspended indefinitely?

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AV.13: Old Kent Road Area Vision” which includes Pages Walk, Site Allocation NSP54: Crimscott Street & Pages Walk

Policy: NSP54 Crimscott Street and Pages Walk & NSP55 Mandela Way
Positively Prepared: No

These site allocations are not positively prepared or justified because they are unclear, internally inconsistent and because they are not based on robust evidence or on appropriate participation, engagement and consultation.

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High buildings on Willow Walk and Pages Walk by their very location sitting alongside and behind the Pages Walk Conservation area would loom over and overshadow from the Conservation Area setting and the views in and out of the Conservation Area. Height restrictions will make the Local Plan clear and unambiguous so that it is positive, effective Plan for the Site from the outset.

The site allocations allow for mixed use development even though there are some exclusively residential pockets within the demarcated sites. This does not consider the disturbance and disruption that A and B class (particularly A3 and A4 establishments) cause to residential areas. The amenities of the

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The AAP sets out a detailed strategy in relation to height. The building heights strategy sets out that buildings facing onto Crimscott Street should be between 6 and 8 storeys and buildings onto (the northern end) of Pages Walk up to six storeys with careful consideration given to the surrounding conservation areas and the setting of listed buildings, particularly to the sensitive roof profile along the south of Pages Walk.

Development to the immediate rear of Pages Walk has been reduced to 3 storeys, as residential town houses with gardens retaining the existing trees backing onto the Pages Walk rear gardens.

A number of policies in the New Southwark Plan seek to protect the historic environment in the borough. This includes Policy P19 (conservation areas) and Policy P20 (conservation of the historic environment and natural heritage) which set out that development must conserve and enhance the significance of conservation areas and heritage assets and their settings.

Policy IP3 (community infrastructure levy (CIL) and section 106 obligations) requires proposed development that may result in potential adverse impacts to be offset by using S106 legal agreements. This requires the developer to either offset the impact or pay the council a financial contribution to enable the council to offset the impact. In addition, the council will secure money from the community infrastructure levy to fund the essential infrastructure identified by the council in our Regulation 123 list.

The revised Area Action Plan also includes a statement about the impact of

residents are severely compromised and causes public nuisance and disorder. The dense development proposed on Mandela Way will increase traffic on both Willow Walk and Pages Walk. Pages Walk is closed at the south end to traffic because it was being used as a rat run from Old Kent Road, it was deemed unsafe in a residential area. The scale of development and high-density proposals will exacerbate and disrupt the residential streets and areas in NS54 and NS55.

Effective :No

The use developments on the eastern side of Crismcott Street 'emerging developments' which are in pre-planning stage as a justification for 9 storey buildings on Pages Walk demonstrates the Tall Buildings Policy is not effective.

There is no evidence that genuine alternatives have been considered - despite many alternatives being clearly voiced (previously and currently) by the local community. Similarly to the (related) Tall Buildings Policy) there is a lack of evidence of local capacity having been properly considered, nor of any flexibility for the significant emergent changes now taking place with regards to viability, office, housing and amenity space needs due to the global pandemic

Justified: No

The plans do not consider the changing needs of the London and people who live and work in London in the post Covid landscape. The cost and rentals of both commercial and residential properties are falling fast in Central London. The plans are not evidence based and further investigation is necessary before the Council launches a frenetic building frenzy. The streets area empty and with more people working at home people are seeking open space, a sight of the sky and green space, not a dense built up concrete environment. The quality of life of the residents will be severely damaged on account of a permanent change in their environment which is not backed by the changed circumstances and uncertain times.

TFL has already backed out of the Bakerloo extension as financially unviable in the present scenario. This was an important consideration in the Council's Development plans. The Plan has been overtaken by circumstances and a

COVID-19 and how the plan has been updated taking this into account.

The Old Kent Road AAP has now been revised for consultation including revisions to masterplan, building heights and site requirements and we welcome further comments as part of this consultation. There is still a strong commitment to the Bakerloo Line project.

There is still a strong commitment to the Bakerloo Line project from the Mayor, TfL, LBS and LBL and the Secretary of State for Transport who recently confirmed that he would be safeguarding the BLE alignment .

fresh view point and approach is necessary to make it meaningful and relevant.

Kath Scott Pages Walk Conservation Residents Association
NSPPSV139.8

Site Allocation NSP55: Mandela Way

Height and Distance of any Replacement Buildings

Is it positively prepared? No

Is it effective? No

We have had numerous meetings with planning officers Colin Wilson and Liz Awoyemi since November 2013 regarding the planned redevelopment in the area behind Pages Walk off Mandela Way that backs onto our gardens. We were pleased in December 2019 with a small win when they agreed to change the original plans for the site behind us to be changed to terraced housing with gardens backing on to our existing gardens of Pages Walk. The Pages Walk Conservation Residents Association are pushing for a limit on 2 stories (rather than the planning proposal of a maximum of 3 stories) so that the new development will mirror our Conservation Street Pages Walk which would maintain the integrity and preserve history of the few pockets of heritage that remain in Southwark. We also want the ground level to be preserved as existing - it sits approximately 0.5 meters below the ground level on Pages Walk. The footprint of the new build should be constrained to the existing building footprint and stand no higher than the existing 8.2 meters. Any changes to this will result in a loss of light which will be fiercely opposed by all residents. However, we are concerned that in the new EIP38 Feasibility Study (2018) Page 59 this area has been zoned for a possible 4 story development, this is completely against previous assurances and proposals by Southwark Planning Officers.

We have previously requested an explanation how the Conservation Area principles and objectives of sustaining and enhancing the areas character will

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Policy P60 requires development to retain and protect significant existing

be met if the intention is to build 5-6 stories high buildings (and behind that even higher buildings) directly backing the conservation area to the north of the terraced houses. We are also aware that Historic England has expressed concerns about the height of buildings that are directly affecting 'historic rooflines' of the Georgian and Victorian north and south of Old Kent Road and particularly the Pages Walk, Thornburn Square and other Conservation Areas in the area. We were previously assured that buildings would slowly scale up as they move away from Pages Walk but on the new proposal there are areas zoned for 8 storey and even up to 15 storey development in relatively close proximity to Pages Walk. Surely this is sits against Southwark Planning principles of sustaining and enhancing Conservation Areas particularly as all existing building sit at a maximum of 2 stories in the locality.

Environmental Impact

Residents are also attaching importance for all the existing trees to be preserved as an environmental issue. The existing area of Pages Walk terraced gardens backing on to the landscaped gardens of the proposed area for redevelopment on Mandela Way creates a wildlife corridor and supports a wide range of biodiversity including many types of birds, foxes, squirrels, bees, butterflies and other insects. Living in close proximity to nature is proven to positively enhance health and mental well being. Any destruction of this habitat will have a detrimental affect not only on the environment and well being of residents but will also negatively affect drainage and flooding.

Traffic and Pressure on Road Use

We are also concerned about the impact on roads and traffic that will be caused by this new development. Pages Walk has been a no through road accessed only from Willow Walk for in excess of 15 years. The road is not wide enough to support 2 way traffic and want assurance that there are no plans to change our quiet residential street. With such a huge development planned for the entire length of Mandela Way how will this be put in place without extreme strain put on Mandela Way and Old Kent Road traffic

trees including trees designated with Tree Protection Orders, trees that have high amenity value, trees within conservation areas or the curtilage of listed buildings and veteran, ancient and notable trees. In addition, Policy P59 requires development to contribute to net gains biodiversity through including features such as green and brown roofs, green walls, soft landscaping, nest boxes, habitat restoration and expansion, improved green links and buffering existing habitats. Any shortfall in net gains in biodiversity must be secured off site through planning obligations or a financial contribution.

Policy IP3 (community infrastructure levy (CIL) and section 106 obligations) requires proposed development that may result in potential adverse impacts to be offset by using S106 legal agreements. This requires the developer to either offset the impact or pay the council a financial contribution to enable the council to offset the impact. In addition, the council will secure money from the community infrastructure levy to fund the essential infrastructure identified by the council in our Regulation 123 list.

especially as plans to extend the Bakerloo line have been suspended indefinitely?

Sarah Davidson Pages Walk Conservation Residents Association
NSPPSV473.2

Site Allocation NSP55: Mandela Way

Height and Distance of any Replacement Buildings

Is it positively prepared? No

Is it effective? No

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Residents are also attaching importance for all the existing trees to be preserved as an environmental issue. The existing area of Pages Walk terraced gardens backing on to the landscaped gardens of the proposed area for redevelopment on Mandela Way creates a wildlife corridor and supports a wide range of biodiversity including many types of birds, foxes, squirrels, bees, butterflies and other insects. For evidence please see my submissions to the BTO over a number of years documenting observed wildlife observed in my garden, including bats and a wide range of birds, butterflies and bees. Living in close proximity to nature is proven to positively enhance health and mental well being. Any destruction of this habitat will have a detrimental affect not only on the environment and well being of residents but will also negatively affect drainage and flooding.

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high amenity value, trees within conservation areas or the curtilage of listed buildings and veteran, ancient and notable trees. In addition, Policy P59 requires development to contribute to net gains biodiversity through including features such as green and brown roofs, green walls, soft landscaping, nest boxes, habitat restoration and expansion, improved green links and buffering existing habitats. Any shortfall in net gains in biodiversity must be secured off site through planning obligations or a financial contribution.

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no plans to change our quiet residential street. With such a huge development planned for the entire length of Mandela Way how will this be put in place without extreme strain put on Mandela Way and Old Kent Road traffic especially as plans to extend the Bakerloo line have been suspended indefinitely?

WYG on behalf of John Lyon's Charity
NSPPSV214.7

Site Allocations: Policy NSP55: Mandela Way

The Charity supports the overall direction of the site allocation policy, which seeks to create new homes and provide/retain employment space, in addition to community uses; and public realm improvements across this site. We do however have concerns about the competing and sensitive uses that "must" be provided on the site, and the problems that this could cause in the future. The site is designated as a Locally Significant Industrial Site, with an indicative housing capacity of 1,955 - 2,200 homes. The "Design and Accessibility Guidance" section provides no information on how these uses can co-exist, instead referring to the Old Kent Road Area Action Plan. The Charity wish to reiterate that within the uses that must be provided on site, reference should be made to: "on-site servicing and management of vehicle movements across the site". This will ensure that the needs of all uses, including employment, industrial and residential uses are fully considered within any future development proposals.

We are aware that the Council is scheduled to consider a report in relation to the Old Kent Road Area Action Plan in due course. We will review the 'Submission Version' once released and will make appropriate representations during that consultation period.

Elizabeth Sinclair
NSPPSV353.2

NSP 55: Mandela Way

The Old Kent Road AAP has now been revised for consultation including revisions to masterplan and access and servicing requirements for the plan and we welcome further comments as part of this consultation.

<p>Not positively prepared</p> <ol style="list-style-type: none"> 1. Mixing an industrial site with housing is likely to cause health problems for residents from noise, air pollution and traffic hazard. 2. Unsuitable situation for tall buildings. This is not the town centre which will be focused around the Bakerloo Line Extension at Burgess Park where a tall building has already been given planning approval. Surrounding buildings on Mandela Way are not tall. See the Mayor of London's statement, Policy D1 London's form and characteristics, B. Development design should respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality ... 	<p>The revised Old Kent Road AAP sets out a strategy for mixed use development including industrial co-location and ensuring that there is adequate separation between industrial and residential uses. Specific design criteria are included in the AAP along with access and servicing guidance to address traffic.</p> <p>The Old Kent Road AAP has now been revised for consultation including revisions to masterplan, building heights and site requirements and we welcome further comments as part of this consultation.</p>
<p>Alex Smith NSPPSV529.1</p> <p>I am strongly opposing updates and plans for NSP55: Mandela Way.</p> <p>There is no question that certain parts of this area should and need to be regenerated for the good of the community, the buildings and to attract commerce to the district. However, the scale and ambition of the current plans are totally out of kilter with the surroundings and the needs of Londoners in 2021 and beyond. This is why I write to you today.</p> <p>Most recently, the indefinite delay to the Bakerloo line extension project must call into question the effectiveness and accuracy of the numbers you have projected for this project. The ambitious aim to double the population of Southwark over the next 10 years must either be re-thought or completely abandoned as it will no longer be supported by the infrastructure in terms of transport to support such a huge increase in population. Also the economic confidence that people will be able to buy the huge volume of flats or rent the office space.</p> <p>Specific objections:</p>	<p>There is still a strong commitment to the delivery of the Bakerloo Line project. The delivery of the homes and expected increase in population on the Old Kent Road is phased based on key milestones with the Bakerloo Line project. Further details on the phasing can be found in the latest draft of the Old Kent Road AAP and we welcome further comments as part of this consultation.</p> <p>Any development that is brought forward in this area will be assessed against the development management policies outlined in the plan e.g. Policy P12: design of places, P13: design quality, P19: conservation areas, P55 protection of amenity, and the detailed design guidance in the draft Old Kent Road AAP. This considers design quality, the impact a development may have on the local heritage assets and the impact it could have on the existing community in terms of amenity.</p> <p>The AAP sets out a detailed strategy in relation to height. The building heights strategy sets out that buildings facing onto Crimscott Street should be between 6 and 8 storeys and buildings onto (the northern end) of Pages</p>

Height and Distance of any Replacement Buildings

Is it positively prepared? No

Is it effective? No

We have had numerous meetings with planning officers Colin Wilson and Liz Awoyemi since November 2013 regarding the planned redevelopment in the area behind Pages Walk off Mandela Way that backs onto our gardens. We were pleased in December 2019 with a small win when they agreed to change the original plans for the site behind us to be changed to terraced housing with gardens backing on to our existing gardens of Pages Walk. The Pages Walk Conservation Residents Association are pushing for a limit on 2 stories (rather than the planning proposal of a maximum of 3 stories) so that the new development will mirror our Conservation Street Pages Walk which would maintain the integrity and preserve history of the few pockets of heritage that remain in Southwark.

We have previously requested an explanation how the Conservation Area principles and objectives of sustaining and enhancing the areas character will be met if the intention is to build 5-6 stories high buildings (and behind that even higher buildings) directly backing the conservation area to the north of the terraced houses. We are also aware that Historic England has expressed concerns about the height of buildings that are directly affecting 'historic rooflines' of the Georgian and Victorian north and south of Old Kent Road and particularly the Pages Walk, Thornburn Square and other Conservation Areas in the area. We were previously assured that buildings would slowly scale up as they move away from Pages Walk but on the new proposal there are areas zoned for 8 storey and even up to 15 storey development in relatively close proximity to Pages Walk. Surely this sits against Southwark Planning principles of sustaining and enhancing Conservation Areas particularly as all existing buildings sit at a maximum of 2 stories in the locality.

Walk up to six storeys with careful consideration given to the surrounding conservation areas and the setting of listed buildings, particularly to the sensitive roof profile along the south of Pages Walk.

Development to the immediate rear of Pages Walk has been reduced to 3 storeys, as residential town houses with gardens retaining the existing trees backing onto the Pages Walk rear gardens.

Representation	Officer Response
<p data-bbox="188 317 1106 381">NSP56 107 Dunton Road (Tesco store and car park) and Southernwood Retail Park</p> <p data-bbox="188 391 398 454">Elizabeth Sinclair NSPPSV353.3</p> <p data-bbox="188 499 1070 675">NSP 56: Dunton Road and Southernwood Retail Park Should include that the site is also in close proximity to: heritage assets, Thomas A Becket pub and the Dun Cow former pub the Cobourg (spelling incorrect on NSP 2020) Road Conservation Area and the Trafalgar Avenue Conservation Area (omitted)</p>	<p data-bbox="1140 499 2018 563">Heritage assets and Conservation Areas have been updated in the revised draft of the Old Kent Road AAP.</p>
<p data-bbox="188 719 353 783">Hannah Platt NSPPSV498.2</p> <p data-bbox="188 828 1084 1003">My main concern is about the very tall towers due to be built on the site where Tesco is now on the old kent road. Firstly I was told by the council team at the open consultation that the towers were being built to fund the tube extension: well if that's not happening now then the plans should be revised.</p> <p data-bbox="188 1042 1115 1182">I have grave concerns about the scale of the properties and the density of the intended population for this area. I think it would be unreservedly foolish for Southwark council to blindly just follow through on existing plans in light of the pandemic and how that is affecting the way we all live and work.</p> <p data-bbox="188 1220 1111 1431">I feel that the plans reflect a panic to build properties to hit a housing target & this will result in a similar situation that produced the vast council estates that spanned from in elephant and castle to Bermondsey. Additionally the lack of aspirational residential properties, the stack em high sell em cheap planning and a distinct lack of provision of adequate additional infrastructure needed during the 20 years of building does nothing to make me, a resident</p>	<p data-bbox="1140 828 2051 1144">There is still a strong commitment to deliver the Bakerloo Line project. The Tesco site is proposed as a site for one of the new Bakerloo Line stations. There is a need for taller buildings in order to deliver the ambitious target of 20,000 new homes and the benefits which go along side this i.e. delivery of new open space, schools and healthcare. The revised draft of the AAP intends for 7,000 of the new homes to be social rented and intermediate homes; and a commitment that 50% of these will be let to local residents. The revised Area Action Plan also includes a statement about the impact of COVID-19 and how the plan has been updated taking this into account.</p>

of the area for nearly 20 years, think that this plan is designed to enhance the neighbourhood for those actually living here.

Representation	Officer Response
<p data-bbox="188 317 537 344">NSP58 96-120 Old Kent Road</p> <p data-bbox="188 357 398 421">Elizabeth Sinclair NSPPSV353.4</p> <p data-bbox="188 467 474 531">NSP 58 Lidle OKR Not positively prepared</p> <p data-bbox="188 539 1106 708">1. Unsuitable situation for tall buildings. This is not the town centre which will be focused around the Bakerloo Line Extension at Burgess Park where a tall building has already been given planning approval. Surrounding buildings at the Lidl site are not tall. See the Mayor of London’s statement, Policy D1 London’s form and characteristics, B.</p> <p data-bbox="188 719 1093 818">Development design should respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality</p>	<p data-bbox="1140 429 2047 671">P16: Tall Buildings provides overarching guidance for taller buildings along with the tall buildings strategy in the Old Kent Road AAP. Any development that is brought forward in this allocation will be assessed against the development management policies outlined in the plan e.g. Policy P12: design of places, P13: design quality, and detailed design guidance in the draft Old Kent Road AAP to ensure development responds appropriately to the local context.</p>

Representation	Officer Response
<p data-bbox="188 317 672 347">NSP62 Former Southern Railway Stables</p> <p data-bbox="188 357 398 421">Elizabeth Sinclair NSPPSV353.5</p> <p data-bbox="188 466 1064 671">NSP 62: Former Southern Railway Stables Not consistent with national policy As well as listing the buildings as heritage assets, the cobbled area should also be designated as an element to be retained in any development to conform to the NPPF policy 16.Conserving and enhancing the historic environment</p>	<p data-bbox="1140 429 2063 603">The stables and forge buildings, including their boundary wall on Catlin Street have been designated as buildings of architectural and historic merit and these will be retained and integrated into new residential development. The heritage guidance in the revised draft of the Old Kent Road AAP sets out that the granite sets should be retained and reused in any redevelopment.</p>

Representation	Officer Response
<p data-bbox="188 317 1043 347">NSP63 Land bounded by Glengall Road, Latona Road and Old Kent Road</p> <p data-bbox="188 357 398 421">Elizabeth Sinclair NSPPSV353.6</p> <p data-bbox="188 467 1115 890">NSP 63: Land bounded by Glengall Road, Latona Road and Old Kent Road Not positively prepared nor justified Design guidance should include reference to: existing estates (e.g. Friary Estate) regarding respecting local character and building heights, massing etc. See P11, 1.1 to 1.3 Trafalgar Avenue, Caroline Gardens have not been included in the conservation areas affected by the development Heritage assets should also include: Travis Perkins group of buildings (timber shed and stable buildings as well as the chimney), Topps Tiles 19th century brick warehouse, Surrey Wharf 19th century building, Glengall Road Wharfside, Harris Works (Haymerle Road), 55-57 Glengall Road, 3-5 Latona Road, Frensham Street Depot.</p>	<p data-bbox="1140 429 2018 564">The revised draft of the Old Kent Road AAP sets out more detailed design requirements and heritage guidance for the site allocation. The sub area guidance sets out particular assets of note and which will be retained. We welcome further comments as part of this consultation.</p>

Representation	Officer Response
<p data-bbox="185 316 757 347">NSP64 Marlborough Grove and St James's Road</p> <p data-bbox="185 355 745 419">WSP on behalf of Apex Investment Group Ltd NSPPSV474.10</p> <p data-bbox="185 464 344 491">Policy NSP64</p> <p data-bbox="185 499 1061 563">We support the inclusion of 310-330 St James's Road within the draft site allocation NSP64:</p> <p data-bbox="185 571 1068 675">Marlborough Grove and St James's Road. However, given that 310-330 St James's Road can come forward on its own within the next few years, this should be split out and included as its own site allocation.</p> <p data-bbox="185 683 1111 850">The designation of 330 St James's Road, along with part of the old Japan Factory building as 'Buildings of Townscape Merit' within the draft allocation is not justified through the preparation of a suitable evidence base and there is no explanation given within the current draft OKR AAP of why the buildings have been categorised as such.</p> <p data-bbox="185 858 1111 1137">A statement provided by Heritage consultants KM Heritage is appended to this representation and concludes that the building at 330 St James's Road is not of sufficient quality to be deemed a heritage asset, given its modern construction and unremarkable architectural form. In addition, it is entirely hidden from the public realm, and it has been extended, modified, re-roofed, some windows blocked, others replaced – all of which has impacted its physical integrity and any meaningful contribution to townscape character and the aspirations of high-quality regeneration of the area.</p> <p data-bbox="185 1145 1093 1361">Therefore, 330 St James's Road should not be shown as a Building of Townscape Merit within the site allocation, as there is no justification which the Council have provided for this. Our heritage consultant's assessment confirms that it has no heritage value and it does not meet the criteria for a non-designated heritage asset and does not merit conservation under draft Policy P20 (see above).</p> <p data-bbox="185 1369 1093 1433">The approach to tall buildings which is set out in the site allocation does not provide any details of locations where 'taller' buildings will be acceptable</p>	<p data-bbox="1137 427 1323 454">Support noted.</p> <p data-bbox="1137 499 2056 675">Development will occur incrementally on the site allocation allowing certain developments to come forward before others. The ambition of the Council is to deliver the site as one allocation. The revised draft of the Old Kent Road AAP taken 310-330 St James's Road into account in the masterplan and the phasing guidance.</p> <p data-bbox="1137 715 2063 1034">Building of townscape merit justification. The council has completed a heritage study of the commercial buildings within the Old Kent Road area, and this identifies their historic use and the degree to which they have been altered over time. Some, although not all of the buildings 330 St. James' Road are identified as being of townscape merit. The redevelopment of this part of the site allocation would incorporate these buildings into a working yard space that would promote permeability through the site. The building's townscape merit help maintain a sense of the areas historic development and use.</p> <p data-bbox="1137 1074 2063 1249">The Old Kent Road AAP provides a detailed tall buildings strategy which will set out appropriate locations for tall buildings. The AAP also sets out more detailed design requirements relating to the height and scale of development within this site allocation and we welcome further comments as part of this consultation.</p> <p data-bbox="1137 1289 2033 1361">We will be addressing the changes to the use classes order and their effect on the policies in our responses to the matters raised by the Inspectors.</p>

within the allocation subject to consideration of impacts listed, with reference to an available evidence base.

It is therefore assumed that this work is to be undertaken as part of the future evidence base for the next iteration of the OKR AAP. There is also no definition given of 'taller' buildings, and it is not clear whether this is the same as the definition of 'tall' buildings which are generally understood to be buildings of 30 metres or more in height, as set out in the Tall Buildings Background Paper (June 2020), the emerging New Southwark Plan and the adopted London Plan.

The 'Site Requirements' should be updated to refer to the new Class E, replacing references to use classes A, D and B class uses.

Representation	Officer Response
<p data-bbox="188 316 674 347">NSP65 Sandgate Street and Verney Road</p> <p data-bbox="188 464 1115 603">Inaccurate Identification of Industrial Buildings and Land as Buildings of Merit The New Southwark Plan Schedule of Changes document (August 2020) (ref. EIP27D) details proposed modifications to the ‘Sandgate Street and Verney Road’ Site Allocation (ref. NSP65).</p> <p data-bbox="188 608 1115 746">These modifications include the reference of listed and unlisted heritage assets within the Site Allocation, and inclusion of these buildings on the site map accompanying the Site Allocation, “for factual accuracy and information” (ref. CPC0358).</p> <p data-bbox="188 751 1115 962">The modified plan of the Site Allocation at page 350 of the NSP (August 2020) is shown below in Figure 1. This identifies the Wevco Wharf building as a Building of Architectural and Historical Merit (shown purple) and a stretch of hardstanding leading into the Wevco Wharf site and within the surrounding service yard as a Building of Townscape Merit (shown orange). (Please refer to 44. Pegasus Group in the Consultation response folder for image)</p> <p data-bbox="188 967 1115 1070">Both of these identified constraints appear to be unjustified and cartographical errors, as detailed further below, and as such we request that they are removed from the Site Allocation in the NSP.</p> <p data-bbox="188 1075 1115 1142">i. Identification of Industrial Warehouse as Building of Architectural and Historical Merit</p> <p data-bbox="188 1147 1115 1393">The identification of the Wevco Wharf industrial warehouse building as a Building of Architectural and Historical Merit appears to have been incorrectly derived from the draft Old Kent Road Area Action Plan/Opportunity Area Planning Framework (AAP/OAPF) (December 2017). This document provides an aerial image of the Sandgate Street Area, with the legend identifying Buildings of Architectural and Historical Merit in a blue colour.</p> <p data-bbox="188 1398 1115 1430">As can be seen in the aerial image in Figure 2 below, the Wevco Wharf</p>	<p data-bbox="1140 464 2056 710">The draft 2017 AAP includes an aerial photograph and key on page 107 of “The Area Today”. Buildings of architectural and historic merit are keyed in a light blue colour. The existing roof of Wevco Wharf is of a similar light blue colour, which is where this misunderstanding has arisen. We can confirm that Wevco Wharf is not a building of architectural and historic interest notwithstanding its light blue roof finish. We will amend the colour on the redrafted 2020 AAP plan to make that clear.</p> <p data-bbox="1140 751 2065 890">Part of the existing hard standing comprises an area of granite sets that survive from the historic gas works. They were the original road surface for the northerly service road to the gas works as can be seen on page 107 of the 2017 draft AAP and page 147 of the 2020 draft AAP.</p> <p data-bbox="1140 932 2042 1035">The extent of the granite sets has not been accurately mapped in the 2017 draft AAP. The mapping will be updated in the 2020 AAP draft to reflect the 2018 local listing.</p> <p data-bbox="1140 1075 2065 1321">Since the Old Kent Road characterisation study was commissioned in 2015 LBS have commissioned and completed a more detailed study of the areas industrial heritage in 2019. In addition both the 2017 and 2020 draft AAP’s proposed the creation of a new publically accessible space in this location called “The Canal Grove Park”. These granite sets would form a historic feature of that new space and would enhance the townscape of the new park and the setting of the adjacent listed buildings at Canal Grove Cottages.</p> <p data-bbox="1140 1362 2004 1430">At present this surface could be removed under permitted development rights. Elsewhere in the plan area LBS has issued an article 4 direction in</p>

building comprises a blue roof which appears to have been mistaken by officers for a Building of Architectural and Historical Merit when reading the draft Old Kent Road AAP/OAPF – and this perceived (incorrect) classification has then been carried forward to the emerging NSP. (Please refer to 44. Pegasus Group in the Consultation response folder)

The existing warehouse building evidently has no architectural or historical merit of any significance. It is not identified within the draft Southwark Local List (2018) nor within the Old Kent Road Characterisation Study (2015) which forms part of the evidence base identifies Townscape Merit Buildings, Buildings of Architectural or Historic Merit and Historic Features/Landmarks at Figure 4.9. Nor is it shown on the relevant map showing the site (Section C, Sheet 2) within English Heritage’s Old Kent Road Survey 2009 – which identifies Unlisted Buildings of Townscape Merit.

As such, and on the basis of the above, its inclusion is clearly a cartographical error and we therefore request that it is removed from the Site Allocation in the NSP.

ii. Inclusion of Hard Surfacing as Building of Townscape Merit

The Site Allocation plan at page 350 of the NSP also identifies a stretch of land located partly in the service yard of the Wevco Wharf site as a Building of Townscape Merit. There is no building that exists in this location as can be seen in Figure 2 above.

Instead the land identified shows hardsurfacing associated with the Warehouse hardstanding and beyond.. The stretch of land identified does include cobbles identified within the draft Southwark Local List (2018) but also includes concrete hardstanding.

Given the location and use of the land within a private industrial service yard any townscape significance of the cobbles is extremely limited. Indeed this is evidenced through the lack of their inclusion within the Old Kent Road Characterisation Study (2015) which specifically identifies Townscape Merit Buildings and Historic Features/Landmarks (including at the Wevco Wharf site at Figure 4.9) and forms part of the evidence base underpinning the NSP. Furthermore the land is not identified in the relevant map showing the site (Section C, Sheet 2) within English Heritage’s Old Kent Road Survey 2009 –

respect of the buildings at OKR 12 “The Former Southern Railway Stables” and will consider doing the same here .

which specifically identifies Unlisted Buildings of Townscape Merit.

It should also be noted that replacement of hard surfaces within the curtilage of a warehouse premise can be undertaken utilising permitted development rights afforded by Class J, Part 7 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

There is no rationale for including it within the Site Allocation as it indicates it could be afforded planning protection, whereas actually it can be removed at any time without planning permission under legislative provisions. On the basis of the above, we request that the inclusion of the land as a Building of Townscape Merit is removed from the Site Allocation in the NSP.

On the basis of the above, we request that the inclusion of the land as a Building of Townscape Merit is removed from the Site Allocation in the NSP.

Conclusion

In summary, we request that the Council removes the identification of Buildings of Architectural and Historical Merit, and Buildings of Townscape Merit from our client's site at Wevco Wharf, from the Sandgate Street and Verney Road Site Allocation plan within the NSP – on the basis that there is no evidenced justification for identifying them.

Specifically, we request removal of the Wevco Wharf warehouse building as a Building of Architectural and Historical Merit, and removal of the stretch of the hard surfacing of the service yard within our client's site as a Building of Townscape Merit, where no building exists.

Contrary to the reasons the Council have stated for their inclusion within the Proposed Changes to the Submitted New Southwark Plan (August 2020), i.e. to provide factual accuracy and information, they instead are inaccurate and paint a false representation of the architectural, historical and townscape merits of the industrial building and surrounding service yard.

The existing Wevco Wharf warehouse building evidently has no architectural or historical merit of any significance and its classification appears to be a cartographical error.

Whilst cobbles exist in a small part of the service yard, the extent of the

Building of Townscape Merit shown does not correlate with this. Notwithstanding this, reference to the cobbles as any sort of non-designated heritage asset within the NSP is unwarranted and misleading, as these could be replaced at any time utilising permitted development rights afforded by Class J, Part 7 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). In light of the above, we request that both classifications are removed from the Sandgate Street and Verney Road Site Allocation plan in the NSP. I trust that these representations will be considered and actioned in the emerging NSP and I look forward to confirmation of their receipt. Please refer to 44. Pegasus Group in the Consultation responses folder for image

HGH on behalf of Tribe Student Housing Limited ('Tribe')
NSPPSV470.3

1. Draft Allocation NSP65: Sandgate Street and Verney Road
Tribe welcomes the inclusion of the KFC Site (671-679 Old Kent Road) within site allocation 'NSP65' in recognition of the fact that it forms part of an identified Opportunity Area and thus a critical regeneration area for the borough.
The allocation covers an extensive area measuring 127,600sqm with an indicative residential capacity of 3,680 – 5,300 homes, therefore, it is appropriate that a range of uses are sought for redevelopment proposals within NSP65, including housing, retail, employment and community uses. However, the specified uses should also include student housing, in recognition of the fact that student housing indirectly contributes towards the borough's housing targets (and thus the indicative residential capacity target of 3,680+ homes for the area) and in doing so reduces pressures on the local housing market by releasing residential dwellings back to the private rented sector. This is consistent with the approach taken in the emerging new London Plan which states in the supporting text (paragraph 4.1.9) to Policy H1 that "net non-self-contained accommodation for students

Support noted.

The revised draft of the Old Kent Road AAP provides further guidance on the range of uses appropriate for this site allocation. Policy AAP13 of the December 2017 draft AAP and draft policy AAP13 of the December 2020 draft AAP both state, "We will bring a new university, and other higher and further education facilities to the Old Kent Road"; and development must contribute to "New and improved higher and further education facilities..." Such facilities can include student accommodation, provided they are in compliance with P5: Student homes. One scheme for student accommodation has been approved on appeal at 262-272 St James's Road (18/AP/0156) and is currently under construction. The appeal was in respect of the viability of the scheme and the offsite affordable housing contribution being offered by the developer. A further scheme was recently approved subject to the completion of a legal agreement 43-47 Glengall Road (20/AP/0039). A scheme at 313 Ilderton Road is being recommended for approval to planning committee in January 2020. There is a final scheme

should count towards meeting housing targets on the basis of a 2.5:1 ratio, with two and a half bedrooms/units being counted as a single home.”

Furthermore, student housing provides numerous other benefits, including:

- Contributing towards mixed and integrated/inclusive neighbourhoods, meeting the strategic objectives of the NSP (Policy SP2) and new London Plan (Policy H15);
- Increasing the attractiveness of educational institutions within the borough to students; and
- Increasing local spending power.

which is in as a planning application but has yet to be determined on the KFC site at 671-679 Old Kent Road (20/AP/2701).

Representation	Officer Response
<p data-bbox="188 317 902 344">NSP67 Hatcham Road and Penarth Street and Ilderton Road</p> <p data-bbox="188 357 398 421">Elizabeth Sinclair NSPPSV353.7</p> <p data-bbox="188 467 925 531">NSP 67: Hatcham Road and Penarth Street and Ilderton Road Not positively prepared nor justified</p> <p data-bbox="188 539 1093 746">Inadequate green space indicated on the map for the number of intended homes. Ilderton Road which goes through this area is a main traffic artery which will be a significant source of pollution for these homes and the projected parks and divide the space. See London Plan 7.4 People should be able to live and work in a safe, healthy, supportive and inclusive neighbourhood</p>	<p data-bbox="1140 429 2056 708">The revised draft of the Old Kent Road AAP can provide more detail on the open space strategy, in general for the whole opportunity area and more specifically in the Parks and Recreation strategy for Hatcham Road, Penarth Street and Ilderton Road. There has been a newly designated open space within this allocation – Pat Hickson Garden and the masterplan proposes another new open space on Hatcham Road of approximately 0.09ha. Further guidance on the road network for each site allocation can be found in the AAP and we welcome further comments as part of this consultation.</p>
<p data-bbox="188 791 808 855">Montagu Evans on behalf of Nathaniel Henry Clark NSPPSV38.2</p> <p data-bbox="188 901 1099 1431">Strategic Protected Industrial Land (SPIL4) Firstly, the draft site allocation NSP67 should be amended to exclude the Penarth Centre as Strategic Protected Industrial Land (SPIL4). While it is acknowledged that the Site is designated as falling within Protected Industrial Land within the adopted Development Plan and within Strategic Protected Industrial Land (SPIL4) within the emerging New Southwark Plan and Old Kent Road Area Action Plan (OKRAAP), the Penarth Centre clearly does not make a significant contribution to the overall supply of industrial and commercial floorspace in SPIL4. The Penarth Centre is identified in the Southwark Employment Land Review (SELR) (January 2016). The SELR identifies: ☐ The quality of employment stock within this area (cluster 7) is generally poor, ageing and has seen no investment for a considerable time and the report notes ‘it is difficult to envisage widespread new investment in commercial property in this area’; and</p>	<p data-bbox="1140 901 2065 1145">The sites proposed as SPIL on the NSP proposals map will remain as industrial sites only suitable for industrial retention or intensification. The remainder of the site allocation is proposed as LSIS designation. This is land currently in industrial use but is proposed for industrial co-location with new homes under site allocation policies in the NSP, and in the Old Kent Road AAP policies and the masterplan. This is why the proposals for mixed use development have been granted in this location.</p> <p data-bbox="1140 1189 2056 1326">The revised draft of the Old Kent Road AAP includes detailed guidance on land uses which will be permitted within the Penarth Centre. It is suitable for employment purposes and other sui generis transport related uses. In addition, arts and cultural uses will be permitted.</p> <p data-bbox="1140 1369 2065 1431">The sites proposed as SPIL on the NSP proposals map will remain as industrial sites only suitable for industrial retention or intensification. The remainder of</p>

☒ The SELR identifies however that the stock provides a useful purpose supporting creative uses that have been moving in. The Old Kent Road Employment Study (March 2016) identifies the Hatcham Road area as accommodating a cluster of artistic and creative sector uses. It also however identifies a large number of faith establishments within the area (15 across the area and 8 within the Penarth Centre alone). The pressure for continued use of the Penarth Centre for faith purposes is illustrated by the large number of planning applications to retain and introduce space for religious purposes within the Penarth Centre (Appendix 1) and is a clear indicator of a distinct lack of demand for space within the Penarth Centre for commercial use. In addition to this, there are existing residential uses on the Site located at Unit 18 and 33. An assessment of the quality of space within the building, with specific regard to Units 29 & 31 has been prepared by Montagu Evans and is provided at Appendix 2 of this representation. This report also details the requirements for modern commercial and industrial occupiers in this location, how that compares to the accommodation within the Site and the necessary steps that would be required to upgrade the Penarth Centre to achieve a reasonable prospect of being let by a commercial occupier. The conclusion within the assessment is that the space within the Penarth Centre and Units 29 and 31 is sub-optimal and not fit for purpose for modern industrial commercial occupation. The lack of service yard and street level access is to the detriment of the attractiveness of the unit to the market. In addition, the absence of a heavy goods lift within the building further reduces the attractiveness of the Site to prospective industrial occupiers, particularly for premises located at first floor level. In addition to this, it is relevant to note that the Hatcham Road industrial estate, comprising mainly commercial and light industrial uses within a range of yards and low rise buildings, forms the site's wider context to the south, east and west. Within the industrial estate there are also a number of artists' studios and creative workspaces. It must be noted that there are several major residential-led developments within the immediate vicinity to the site which have recently been granted planning permission by the LPA and are

the site allocation is proposed as LSIS designation. This is land currently in industrial use but is proposed for industrial co-location with new homes under site allocation policies in the NSP, and in the Old Kent Road AAP policies and the masterplan. This is why the proposals for mixed use development have been granted in this location, parts of which are identified as LSIS and other parts as SPIL. The Penarth Centre in aggregate with other sites designated as SPIL over the plan area make a significant contribution to the overall supply of industrial and commercial space.

The revised draft of the Old Kent Road AAP (December 2020) includes detailed guidance on land uses which will be permitted within the Penarth Centre. This guidance reiterates the guidance contained in the previous December 2017 draft AAP. The SPIL is identified as being suitable for employment purposes and other sui generis transport related uses, "In addition, arts and cultural uses will be permitted in the Penarth Centre. Residential and other sensitive uses will not be permitted in SPIL;...."

Since 2016 LBS has completed an industrial demand study (2019) which established a continuing demand for a variety of workspaces within the Opportunity Area. The draft AAP identifies that the Penarth centre can accommodate cultural and artistic uses so its designation as SPIL would not limit the development or intensification of those uses within the Penarth centre. The buildings inherent flexibility and ability to accommodate a variety of commercial uses has underpinned its success in sustaining a vibrant creative cluster.

However LBS consider that any additional residential accommodation within the Penarth Centre would undermine this and would limit the potential to further intensify commercial and creative uses on the site. Additional housing to meet demand can be provided in purpose built mixed use typologies planned for adjacent sites as set out in the draft AAP.

now in the process of being delivered (see map at Appendix 3). This includes:

LPA Ref: 18/AP/1049

Address: 78-94 Ormside Street London SE15 1TF

Proposal: Redevelopment of the site to deliver a mixed-use building of 9/10 storeys comprising 2,058 sqm of replacement commercial floorspace (B1 use) and 56 residential units

Decision: Granted

Date: 29 March 2019

LPA Ref: 17/AP/3757

Address: 60A And 62 Hatcham Road and 134-140 Ilderton Road London SE15 1TW

Proposal: Mixed use redevelopment comprising: demolition of existing buildings and construction of a building ranging in height from four to nine storeys to provide 1,179 sqm (GIA) of commercial space (use class B1) at ground floor and 86 residential dwellings above

Decision: Granted

Date: 18 March 2019

LPA Ref: 17/AP/4546

Address: Demolition of existing building and erection of a part 5, 8 and 9 storey plus basement mixed-use development (max height 29.98m) comprising 2,351 sqm (gia) of flexible workspace (Use Class B1) and 84 residential apartments (Use Class C3)

Decision: Granted

Date: 13 September 2018

In addition to the above consented developments, we note that there is a pending planning application for a major residential-led redevelopment at 227-255 Ilderton Road London SE15 1NS. The application (LPA Ref. 19/AP/1773) seeks permission for, "Demolition of existing buildings and the erection of a part 2/3, 9 and 28 storey (up to 94.65m AOD) mixed-use development comprising 2,538 sqm of industrial floorspace (Use Classes B1c/B8) at ground and intermediate levels and an internal loading yard; and 254 residential apartments (C3)".

It is clear that the above consented planning permissions will, once built out, result in a significant quantum of residential units in this location resulting in a change in the character of area to one that is primarily residential in character. This change in character is consistent with the LPA objectives set out within the OKRAAP which is seeking to create a 'new vibrant neighbourhood where people can live and work' in this location. Site NSP67 also states that the redevelopment of the area 'must' provide new homes. In summary, the Site clearly provides existing accommodation that is sub-optimal and not fit for purpose for modern industrial commercial occupation. This is evidenced by the occupation of the existing building by a range of faith, retail and artistic type uses as well as existing self-contained residential units. Further, the immediate surrounding area is to be primarily residential in the future (as evidenced by the recent planning permissions above). As such, the designation of the Site as SPIL would be counter to the Council's aspiration for the Site to be developed as a cultural and artistic cluster as it could limit the types of uses that could be permitted there in the future, and potentially restrict uses that are conducive to and support culture and art within the Penarth Centre.

Live/Work Units

Draft Site allocation NSP67 should be amended to allow for greater flexibility with regards to the allocated uses classes for the Site and should be amended specifically to allow for and promote the delivery live/work units (Sui Generis Use) within the Penarth Centre. Critically, the current draft policy wording would undermine the ability of the Penarth Centre to effectively operate and flourish as a creative cluster.

As stated previously, on behalf of our client, Montagu Evans are currently progressing a planning application for the change of use of the units 29 and 31 from office/light industrial (Use Class B1) to a single live/work unit (Sui Generis). Our client's use of Units 29 and 31 is for predominately employment based contemporary art production comprising a mix of uses including office and light industrial functions alongside a small element of ancillary residential accommodation. This represents an innovative and flexible use that secures the continued function of these units for

employment generating purposes.

Draft London Plan Policy HC5 (Supporting London's Culture and Creative Industries) states that development proposals should:

"...protect existing cultural venues, facilities and uses where appropriate and support the development of new cultural venues...

...identify and promote new, or enhance existing, locally-distinct clusters of cultural facilities, venues and related uses defined as Cultural Quarters, especially where they can provide an anchor for local regeneration and town centre renewal..."

The Site is designated as falling within a Strategic Cultural Area within the emerging New Southwark Plan. Draft NSP Policy P45 (Leisure, Arts and Culture) states that development must retain or re-provide existing leisure, arts and cultural uses. Draft Policy P45 also supports development where new arts and cultural venues are proposed within the Old Kent Road Opportunity Area Core (within which the Site is located).

Further, the NSP Old Kent Road Area Vision states that development on the OKR should include growing sectors such as the arts industry and that innovative ways of mixing homes with commercial uses should be promoted. Southwark's direction of travel within recent planning policy supports the use of the Penarth Centre as a creative hub that should enable and encourage artistic uses. Within the OKRAAP, the Penarth Centre falls within draft site allocation OKR 16 Hatcham Road and Ilderton Road. The draft allocation recognises the established artistic presence in the Penarth Centre as it states:

"However, the type of businesses on the estate is changing as the manufacturing businesses have moved out, a mix of some faith premises and increasingly startup businesses, artists and small scale makers have moved in. The small scale industrial units in buildings such as the Penarth centre, 180 Ilderton Road and Hatcham Studios are home to a mix of artists and creative industries".

The draft OKR site allocation states that the LPA objectives are to provide a range of workspaces in this location including light industrial units suitable for small scale manufacturing and makers, artists studios and managed offices.

The draft AAP identifies the Penarth Centre as suitable for the introduction of arts related D use classes (now Use Classes E(e-f) and F1) illustrating a clear recognition of the contribution that the Penarth centre makes to the creative sector generally and the policy support for the development of this location as a creative 'cluster'.

Our client is a key catalyst for and is directly instrumental in the development of the Penarth Centre as a creative cluster. In 2013/2014, a group of six-young artists (including our client) acquired space within the building and began using the spaces for studio space and various creative endeavours. Our client is also in the process of developing proposals for the delivery of enhanced performance and artistic workspaces within the Penarth Centre which will further develop and promote the Penarth Centre as an artistic and cultural cluster within the Old Kent Road.

Critically, the restriction of arts related uses to D class uses (now Use Classes E(e-f) and F1) would undermine the ability of the Penarth Centre to effectively operate and flourish as a creative cluster. Fundamentally, artistic and creative uses comprise a range of uses and activities including elements of production and manufacturing activities and it is common for artists to live and work within their studios. There is a long tradition of buildings that combine studios with living accommodation. There is an equally long tradition of studio houses which function in effect as display spaces for collectors, museum and gallery directors, dealers, critics and others who have a more direct engagement with the business of artistic production. As such, the draft site allocation should be amended to recognise and support this in order to promote the established artistic presence in the Penarth Centre.

In summary, it is clear the use of the Penarth Centre as a creative artistic hub is strongly supported within the emerging planning policy. Critically, artistic and creative uses comprise a range of uses and activities and the draft site allocation should be amended to support this. As such, the draft site allocation NSP67 should be amended to support development that provides live/work units (Use Class Sui Generis) on the Site and within the wider draft site allocation. This would support the delivery of the wider Council

aspiration for the development of the Penarth Centre as a creative 'cluster'.

Please refer to full rep for Appendices.