

Representation	Officer Response
<p data-bbox="188 317 595 347">Strategic Targets and key diagram</p> <p data-bbox="188 357 365 419">Derek Kinrade NSPPSV47.3</p> <p data-bbox="188 464 1090 780">Strategic targets , homes: I have trouble in understanding this. It needs to begin with a definition of ‘social rented’, ‘intermediate’ and ‘council’. Presumably ‘new homes’ refers to the minimum annual number (2355) as the overall housing target, including homes at full market value, although it follows a different heading . This figure over 23 years (2021 to 2043) gives a minimum target of 54,165. The promise to deliver 11,000 new ‘council homes’ is presumably only part of the provision of social rented and intermediate homes which is projected as either 50% (27,082) or 35% (18,958) of all new homes. Confused? I am</p>	<p data-bbox="1140 464 2058 526">The strategic targets are intended as a summary – further explanation on the housing targets can be found under Policy SP1 and Policy P1.</p>
<p data-bbox="188 831 365 893">Derek Kinrade NSPPSV47.4</p> <p data-bbox="188 938 1106 1000">Strategic targets, working towards cleaner energy: ‘reduce’. In the case of a new development what is the level from which a reduction will be expected?</p>	<p data-bbox="1140 938 2063 1287">The New London Plan and the Climate Change Act as legislated by the UK government set out a target to meet net carbon zero by 2050. As demonstrated in the Energy Background Paper (2020), the policies in the NSP are designed to meet this target to align with national and regional planning policy and planning policy guidance, and law. As a council, we have declared a Climate Emergency and set a target to meet net carbon zero as a borough by 2030.This policy will be reviewed in the context of this target which is only based on a Council declaration. This is set out in the Environmental Committee Scrutiny Report November 2020. An updated Energy Background Paper will be produced to set out how the NSP will meet this target.</p>
<p data-bbox="188 1335 1090 1434">Irene Payne Member of Southwark Pensioners’ Action Group and resident of North Walworth NSPPSV454.5</p>	

Strategic Questions

The Plan is in danger of being out of date before it is finalised.
In the light of major impacts of Covid-19 on:

- Retail - location, viability and development
- Offices –reduced need, supply, underuse of existing buildings, design and size of internal space
- Working practices including increases in working from home and locally
- Residential density and housing design – to improve health and minimize disease especially among communities who have been most affected
- Open space, gardens and trees – more and better access
- Health - the need to prevent and manage infection and ill health , and protect those most at risk such as BAME communities and elderly people

There is therefore a need to revisit the strategic direction for the Borough set out in the Southwark Plan. Having the same priorities and doing more of the same will not meet the needs of changing living and working patterns which, whilst they have been accelerated by the virus, were already underway, and are likely to be consolidated in the coming years.

There is therefore a need to review the vision and plan for the new not the old world. At the very least there should be an identification of these likely major changes and the need for flexibility in the Plan, to respond.

These areas of concern are noted, we are continually monitoring and reviewing our evidence base to ensure that we have the most up to date information on development and the impacts of Covid 19 and other changes.

We have not identified any changes required at present as the plan is flexible enough to consider them as part of the planning process, if we do then we will set these out in the matters.

Representation

Strategic Targets and Diagrams Section – Key Diagram

Joanne Mackowski

Officer Response

"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

Do you consider this policy is sound? - why not sound - Effective EFFECTIVE

Do you consider this policy is sound? - why not sound - Consistent with national policy and the London Plan CONSISTENT WITH NATIONAL POLICY AND LONDON PLAN

Do you consider this policy is sound? - why not sound - Positively Prepared POSITIVELY PREPARED

Re: Document EIP 27A Policy: NSP Site Allocations 50 & 51

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 Site Allocations Background Paper however refers to specific planning applications 18/AP/0900 and 20/AP/0944 (as relevant to NSP 50) and to applications 18/AP/4171 and 19/AP/0404 (as relevant to NSP 51) and also refers to the St Thomas Street Regeneration Charter as relevant to both. The proposed quantum of development are many multiples higher than the original projected development capacities which shows that the policies are internally inconsistent.

In referring to the 4 applications in detail the Background Paper when read in conjunction with the evolution of the site allocations (and the tall buildings policy) reveals that the applications themselves have been the drivers for the policy development rather than any understanding or objective assessment of the site or of any genuine engagement. The policies have been developed

Noted.

The Site Allocations Methodology Paper (EIP82) provides justification of the site allocations, the engagement undertaken and the indicative capacities identified within them.

The Consultation Plans and the Consultation Reports prepared at each stage of public consultation to support the New Southwark Plan set out how residents and stakeholders have been consulted throughout the process.

The Updated Integrated Impact Assessment (EIP72 and EIP72A) provide further detail on the Council's considerations of reasonable alternatives for planning for growth on each site allocation and this is set out in Appendix 12, and it now provides details Option C: Higher Option. All site allocation capacities considered during different iterations are also set out within this appendix. The final indicative site capacity assumptions are set out in Appendix 12, and are also provided within the Sites Allocations Methodology Report (July 2020) and the Proposed changes to the Submitted Plan July 2020).

by the planning team in longstanding private negotiation with the developers - and with deliberate ambiguity therein so as to deceive the locality and ignore clearly voiced local opinion about issues like height and associated harm - there is ample evidence available on this issue and of how the consultation which has taken place has been inadequate and it's mistranslation positively divisive. A most recent example is how the baseline study by Social Life has been translated into the Regeneration Charter.

Of the four applications (all of which are in direct contrivance of local opinion) one has been approved by the council (but is long overdue any sign of agreement at the GLA), one is current, one has been rejected and one has been deferred. The latter rejections are in part a reflection of local opinion finally being reflected to some extent through the Planning Committee process (in which the Forum took a constructive part including walks and briefings) however the policies themselves now need overdue drastic revision based on genuine consultation in order to frame appropriate sustainable development for the area (as required by the NPPF) - this is something the Forum would like to discuss, given the opportunity, at the EiP.

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."

Representation	Officer Response
<p data-bbox="188 316 797 347">Strategic Targets and Diagrams Section – Heritage</p> <p data-bbox="188 355 421 419">Joanne Mackowski NSPPSV523.5</p> <p data-bbox="188 464 1077 531">"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 data-bbox="188 571 768 603">Do you consider this policy is sound? - sound NO</p> <p data-bbox="188 608 1070 639">Do you consider this policy is sound? - why not sound - Justified JUSTIFIED</p> <p data-bbox="188 644 1084 676">Do you consider this policy is sound? - why not sound - Effective EFFECTIVE</p> <p data-bbox="188 681 1088 780">Do you consider this policy is sound? - why not sound - Consistent with national policy and the London Plan Consistent with national policy and the London Plan</p> <p data-bbox="188 785 1077 852">Do you consider this policy is sound? - why not sound - Positively Prepared POSITIVELY PREPARED</p> <p data-bbox="943 825 987 852">Re:</p> <p data-bbox="188 857 672 888">Document EIP 27A: Policy P25 Local List:</p> <p data-bbox="188 893 1115 1070">The policy is very short (&lt;100 words) and vague giving five “criteria for a building to be locally listed” which are not subsequently defined in any way (e.g. in terms of substance hierarchy or process). The policy states that “Further information on the Local List is set out in the Heritage SPD” however this SPD has not been published, uploaded or consulted upon.</p> <p data-bbox="188 1110 1115 1214">The policy is not positively prepared nor effective because it is not clear how the policies will meet the objectives, nor how it will be monitored. Definitions for criteria should be developed and the Heritage SPD should be published.</p> <p data-bbox="188 1254 1097 1358">The policy is not justified or legally compliant due to the lack of consultation on the stated criteria, the absent SPD and the consequent lack of consideration of alternative approaches.</p> <p data-bbox="188 1362 1037 1430">I support this policy being in the plan however it should be significantly strengthened as per the comments above in the objections."</p>	<p data-bbox="1140 464 1225 491">Noted.</p> <p data-bbox="1140 536 2024 635">The Heritage Supplementary Planning Document is currently out to consultation until 5 April 2021, any comments on the document should be submitted via the consultation hub.</p>

Representation	Officer Response
<p data-bbox="188 252 835 284">Strategic Targets and Diagrams Section – Open space</p> <p data-bbox="188 293 371 357">Liam Hennessy NSPPSV380.2</p> <p data-bbox="188 400 1077 504">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</p> <p data-bbox="188 544 1111 970">Southwark Council needs to be forced to stop harming our Public Realm - especially with regard to Burgess Park. Southwark Council's own proposed 10 storey building at 21-23 Parkhouse Street must rank as one of the most disgraceful in London - severely overshadowing a Site of Importance for Nature Conservation, or SINC. Southwark Council's so-called Planning Office is also encouraging major 8, 10, and 11 storey developments alongside - along the southern boundary of Burgess Park. The combined effect of all of these will permanently overshadow a new Nature Area. Southwark Council's Planning Office need root and branch change to stop it behaving in a seriously unprofessional and disgraceful manner. The current Planning Office is harming Southwark Public Realm - especially Burgess Park - so it needs to be stopped, urgently and permanently.</p>	<p data-bbox="1140 400 1223 427">Noted.</p> <p data-bbox="1140 475 2056 539">Any planning application for development near Burgess Park will be assessed against Policy P55 (protection of amenity).</p> <p data-bbox="1140 579 2040 683">As Metropolitan Open Land, development surrounding Burgess Park will be guided by policy P56 (open space) is an overarching policy covering all open space in the borough.</p> <p data-bbox="1140 730 1151 751">.</p>

Representation	Officer Response
<p>Strategic Targets and Diagrams Section – Transport</p>	
<p>Tarra Rosenbaum NSPPSV527</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 YES Do you consider this policy is sound? - sound NO Do you consider this policy is sound? - why not sound - Effective</p> <p>Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your coAs :</p> <p>I am late applying this I know from my experience that we are over capacity at rush hour leaving London bridge to other parts of the city. No matter what their research is and approval of TFL my experience is otherwise different so i can't agree with their documentation.</p>	<p>Noted.</p>

Representation	Officer Response
<p data-bbox="188 317 987 347">Strategic Targets and Diagrams Section – Tall Buildings and Views</p> <p data-bbox="188 357 371 421">Liam Hennessy NSPPSV380.3</p> <p data-bbox="188 467 1111 1249">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 The new Southwark Plan needs to consider the issue of fire safety in Tall buildings with far greater care than it currently does: Most new residential towers proposed in Southwark - up to 48 storey towers - are single stair residential towers. Post Grenfell, many people may be surprised to know that by far the majority of new residential towers planned and being built in London have no alternative means of escape in case of fire. They do comply with current regulations, and they have sprinklers, but mechanical systems can go wrong. In the case of Grenfell, smoke and flames entered the stairway soon after the fire started. So much attention has been paid to the issue of cladding at Grenfell that a fundamental matter of fire safety may be forgotten: even if a building suffers a major all-over fire - for whatever reason - the occupants should be able to escape to safety. That is the purpose of fire safety design. For residential towers: To ensure that smoke and flames do not enter the stairway, for at least one hour, in single-stair residential towers, Southwark Council should consider a requirement to isolate the single stairs from the remainder of the accommodation - at each level - by means of a fire-sterile lobby. That should be in addition to the requirement for sprinklers.</p>	<p data-bbox="1140 467 2063 603">Noted. Any material changes to buildings and the development of new building require planning permission and building control sign off which considers the fire safety in the building.</p>
<p data-bbox="188 1262 421 1326">Joanne Mackowski NSPPSV523.6</p> <p data-bbox="188 1369 1077 1431">"Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment)</p>	<p data-bbox="1140 1369 2024 1431">Noted. The policy is sound, evidenced and positively prepared. Locations have been identified on a map. All new tall buildings proposals must meet</p>

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

Do you consider this policy is sound? - why not sound - Effective EFFECTIVE

Do you consider this policy is sound? - why not sound - Consistent with national policy and the London Plan CONSISTENT WITH NATIONAL POLICY AND THE LONDON PLAN

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The policy is not consistent with the London Plan which states (Policy D9 B) that "locations and appropriate tall building heights should be identified on maps". P16 refers to a map and says "these are typically within our Major Town Centres, Opportunity Area Cores, Action Area Cores and the Central Activities Zone. Individual sites where taller buildings may be possible appropriate have been identified in the site allocations." In reality approx. 50% of the site allocations are not in the area defined by the Council's Tall Buildings Map and the site allocations themselves typically say "comprehensive redevelopment of the site could include taller buildings.. towards the (west) of the site.." This does not (contrary to the council's claims) meet the standards of the London Plan and in the lack of clarity the policy means it is not positively prepared.

The London Plan also states (Policy D9 C) that "proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm.""

Policy P16 has begun to take account of adding to " 2. Tall buildings must.. (2.5) Respond positively to local character and townscape" with "3. The design of tall buildings will be required to.. (3.2) Conserve and enhance the significance of designated heritage assets and make a positive contribution to wider townscape character. Where proposals will affect the significance of a

the requirements set out in the draft policy to mitigate any adverse planning issues. P16 is considered compliant with the Mayor's adopted London Plan (2016) and the emerging draft New London Plan, as the workings of our plan-led approach is set out in the emerging Tall buildings background and research paper with an urban context evaluation section mapping out constraints within the Borough. Further to this specific site allocations have been identified to anticipate tall building development within the guidance section to ensure that there is a clear plan-led approach to constructing tall buildings. The background and research paper also discusses how 'appropriate, sensitive and in appropriate locations' have been identified.

An Equalities Impact Assessment (EIP76B) has been prepared to support the Plan, this assesses the impact of each policy on people with protected characteristics and sets out mitigation measures where necessary.

designated heritage asset (from its alteration or destruction, or from development within its setting) clear and convincing justification in the form of public benefits will be required; and (3.3) Avoid harmful and uncomfortable environmental impacts including wind shear, overshadowing, and solar glare..” This is a positive direction for the policy however, - particularly when combined with the weakness of the Site Allocations policies - it does not go far enough in preventing the significant harm tall buildings can cause to the local environment and at the very least should reflect the London Plan’s requirement (as above) for alternatives to be genuinely explored. I would be keen to expand at the examination on how this policy is still deficient in these terms with specific reference to examples from my local area where massively over-scaled and insensitive tall buildings are being proposed and approved on St Thomas Street (London Bridge) to unchecked extreme negative effect.

The policy is not justified because it is not based on robust evidence. It is not legally compliant because it is not based on proportionate evidence and has not paid due regard to the public sector equality duty and is not effective because it is not flexible nor capable of being monitored. Key examples of this are the failure of the Policy or the Tall Buildings Background Paper to demonstrate sufficient capacity (in terms of transport, amenity and social infrastructure) in locations like London Bridge and the Old Kent Road and to have any flexibility for situations like the Bakerloo Line not happening or for significant emergent changes to viability, office, housing and amenity space needs due to the global pandemic. Despite previous representations the plan still fails to take account of the GLA report of 2018 which raised questions about the inherent cost of tall Tall Buildings negating the possibility of social/affordable housing - this in turn raises issues around equality/inclusion and should be discussed at the EiP in relation to SP2 for example."

Representation	Officer Response
<p>Strategic Targets and Diagrams Section – Conservation</p>	
<p>Liam Hennessy NSPPSV380.13</p> <p>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 As before, Liverpool Grove Conservation Area is being severely and permanently harmed by Southwark Council. Southwark Council's 'Planning' Office needs to be stopped from further harming Southwark's Urban Realm. They need to be stopped, urgently and permanently.</p>	<p>Noted.</p> <p>Any planning application on a site within a Conservation Area will be assessed against Policy P19 – conservation areas, requiring development to conserve and enhance the significance of the conservation area.</p> <p>Policy P13 Design quality sets out that development must provide buildings and spaces that utilise active design principles that are fitting to the location, context, scale and type of development. Open and green space is included in this context. It is important that the NSP be read as a whole document.</p>

Representation	Officer Response
<p>Strategic Targets and Diagrams Section – Metropolitan Open Land</p>	
<p>Liam Hennessy NSPPSV380.14</p> <p>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 Burgess Park is designated Metropolitan Open Land. It is supposed to be "protected". Instead, this Metropolitan Open Land is being severely harmed by the Council that is legally obliged to protect it. Southwark Council's 'Planning' Office needs to be stopped from further harming Southwark's Urban Realm. They need to be stopped, urgently and permanently.</p>	<p>Noted.</p> <p>As Metropolitan Open Land, development surrounding Burgess Park will be guided by policy P56 (open space) is an overarching policy covering all open space in the borough.</p>

Representation	Officer Response
<p>Strategic Targets and Diagrams Section – Sites of Importance for Nature Conservation</p>	
<p>Liam Hennessy NSPPSV380.15</p> <p>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 Burgess Park is designated as a Site of Importance for Nature Conservation, SINC. It is supposed to be protected by Southwark Council. Instead, and disgracefully, Southwark Council is leading the harm to Burgess Park along its southern boundary with its own 10 storey building, and encouraging many others alongside. These will all severely overshadow a Nature Area in a Site of Importance for Nature Conservation. All for the sake of Greed. But Southwark Council pretends that these are to build "much needed new homes" as a cover for its and others Greed. It is seriously bad planning. Southwark Council's 'Planning' Office needs to be stopped from further harming Southwark's Urban Realm. They need to be stopped, urgently and permanently.</p>	<p>Noted.</p> <p>As Metropolitan Open Land, development surrounding Burgess Park will be guided by policy P56 (open space) is an overarching policy covering all open space in the borough.</p>