

Representation	Officer Response
<p data-bbox="188 320 568 344">AV0.05 Camberwell Area Vision</p> <p data-bbox="188 360 353 421">SE5 Forum NSPPSV465.7</p> <p data-bbox="188 469 349 493"><b>Not effective</b></p> <p data-bbox="188 504 1066 603">We strongly support the proposal in the plan to provide a new rail station But the policy is not sound as it does not set out an effective means of implementing the objective</p> <p data-bbox="188 612 1048 711">We agree that development in Camberwell should Prioritise walking and cycling and improve public transport and the road network;</p> <p data-bbox="188 721 1055 820">But the plan is not sound as it does not include an effective way of implementing that objective. It fails to reflect the following practical and specific community proposals in relation to traffic and pollution</p> <p data-bbox="188 829 501 853"><b>Camberwell’s Main Roads</b></p> <p data-bbox="188 863 1111 1177">Camberwell’s main roads include the A215 between Walworth and Herne Hill and the A2216 between Camberwell and East Dulwich. The A215 runs along Camberwell Road, Camberwell Green and Denmark Hill, and includes Medlar Street linking from the A202 at Camberwell New Road. The A2216 runs along Champion Park and Grove Lane. The London Borough of Southwark is the highway authority and the traffic authority for both of these routes, except for the Camberwell Green junction (Camberwell Green/Denmark Hill/Camberwell New Road), which is managed by Transport for London.</p> <p data-bbox="188 1187 1093 1323">Camberwell’s main roads are often considered as being primarily routes for through traffic; but they are not substantially different from other streets in Camberwell, being residential streets, shopping streets and the location of critical and sensitive sites such as hospitals.</p> <p data-bbox="188 1332 1093 1431">Many Southwark housing estates are sited directly on Camberwell’s main roads. Castlemead is on Camberwell Road; Champion Hill Estate is on Grove Lane; Champion Park Estate is on Champion Park and Denmark Hill;</p>	<p data-bbox="1140 504 1223 528">Noted.</p> <p data-bbox="1140 576 1995 639">It is not appropriate for the plan to go into detail for delivering the Camberwell Station; TfL will need to be lobbied for the Station opening.</p> <p data-bbox="1140 687 2063 823">The development management policies under SP5 – Healthy active lives set out a number of policies to address transport, traffic and pollution concerns. There are policies to encourage healthy modes of transport including walking and cycling.</p> <p data-bbox="1140 871 2029 1142">In addition, 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. These can include transport improvements.</p>

Denmark Hill Estate is on Denmark Hill; Elmington Estate is on Camberwell Road; Ruskin Park House is on Denmark Hill; and many other estates, such as Crawford Estate and Springhill Close, while not fronting directly onto the main roads, are extremely close to them and are also affected by the air and noise pollutants coming from the traffic on these main roads.

King's College Hospital is a large teaching hospital on Denmark Hill that serves a population of 700 000 people across Lambeth and Southwark but The SE5 Forum for Camberwell's Vision for Camberwell's Main Roads 1 July 2020 page 2 of 2 also serves as a tertiary referral centre in many specialties for millions of people across southern England. The Maudsley Hospital, also on Denmark Hill, is a major psychiatric hospital and the largest mental health training institution in the United Kingdom. Both hospitals are very sensitive receptors for air and noise pollutants, with large numbers of patients whose health conditions and needs mean that they are the least able to cope with polluted and noisy environments.

#### Our Vision for Change

We want to see Camberwell's main roads benefit from much less motor vehicle traffic, and as a result to have significantly fewer air pollutants, especially particulates and oxides of nitrogen, and to be significantly quieter. Much more of the traffic on Camberwell's main roads should be pedestrians and cyclists. To achieve this our main roads should have: —

1. Footways of a proper width, with the capacity for safe and comfortable social distancing between people passing and overtaking each other and around people waiting at bus stops and to enter shops and other businesses and premises, and with space for street trees, plentiful seating and useful street furniture such as litter bins and post boxes. Footways will be a minimum of 4 metres wide, and wider where possible, particularly in the town centre. They will be the focus of the street's design, not the leftover space.
2. Plentiful and direct pedestrian crossings that allow people to cross the road where they want to, in a single stage.
3. Protected facilities for cycling for all, with protection for cyclists from motor vehicles and with enough space for cyclists to overtake each other

<p>comfortably and to cycle alongside each other at less busy times. Usually this will include segregated cycle lanes of at least 2.5 metres in width and, at signal-controlled junctions, early release signals with low-level repeaters and with advanced stop lines with waiting areas at least 5 metres deep.</p> <p>4. Bus lanes reserved for buses and cyclists only at all times. No part-time bus lanes and no taxis or private hire vehicles permitted in bus lanes.</p> <p>4. Bus lanes reserved for buses and cyclists only at all times. No part-time bus lanes and no taxis or private hire vehicles permitted in bus lanes.</p> <p>5. Consistent capacity for motor vehicle traffic, without excessive provision of turning lanes at junctions.</p> <p>6. A 20 m.p.h. speed limit that is enforced</p> <p>7. Introducing local distribution centres in Southwark which use less lorries and can be served by less polluting electric vehicles</p>	
<p>SE5 Forum NSPPSV465.8</p> <p>Test of soundness SP4 Strong Local Economy says highstreets should thrive and this is also reflected in the Camberwell Area Vision. However, this policy is not sound because there is no effective way of monitoring or implementing it in the plan However, 40% of high street settings have no protection. Southwark has failed to take action on empty sites such as the old library</p>	<p>We monitor the different uses and vacancies on our high streets. Given recent government changes to the Use Class Order and Permitted Development Rights we need to reconsider monitoring uses and vacancies in our centres and high streets going forward.</p>
<p>SE5 Forum NSPPSV465.12</p> <p>Test of soundness. Not positively prepared The Camberwell area vision is not positively prepared. It is not clear how the Area Vision will be achieved by the deliverables of the plan. The link between</p>	<p>As set out within the plan development proposals should be prepared in the context of the relevant Area Vision and should demonstrate how they contribute towards the strategic vision.</p>

<p>the plan and each element of the Area Vision should be made more explicit. The link between the plan and each element of the Area Vision should be made more explicit.</p> <p>An example of the plan not being positively prepared is that it fails to record that Camberwell is a positive visitor destination because of its leading modern art gallery South London gallery (joint winner of Art fund museum of the year 2020) world leading health institutions and university .The vision fails to state how the areas attractiveness to visitors will be retained and enhanced</p>	<p>Development proposed within Camberwell will also be assessed against the development management policies within the plan. The outcomes of these policies will be monitored to understand how they are delivering the desired outcomes.</p>
<p><b>The Camberwell Identity Group</b> NSPPSV472.1</p> <p>Not positively prepared or effective.</p> <p>The Area Vision sets no scale for the level of ambition, meaning there is a risk that even a low level of action delivered against the Vision could be deemed sufficient. The plan should set targets and concrete deliverables for Areas and it should set out measures of success, to avoid an underwhelming outcome. It is not clear how the Area Vision will be achieved by the deliverables of the plan. The link between the plan and each element of the Area Vision should be made more explicit.</p> <p>Policy objection I do not consider this policy sound because it is not positively prepared or effective.</p>	<p>As set out within the plan development proposals should be prepared in the context of the relevant Area Vision and should demonstrate how they contribute towards the strategic vision.</p> <p>Development proposed within Camberwell will also be assessed against the development management policies within the plan. The outcomes of these policies will be monitored to understand how they are delivering the desired outcomes.</p>
<p><b>The Camberwell Identity Group</b> NSPPSV472.2</p> <p>Not positively prepared</p> <p>It is not clear from the plan how the Area Vision have been arrived at, in particular how the local community has been involved in both identifying the defining characteristics of the area and establishing the principles for</p>	<p>Considerable consultation has been undertaken throughout the preparation of the plan which has given opportunity for local communities to provide their comments on the plan, including the area visions.</p>

development. Without inclusion of this information, it is hard to be confident that the Vision reflects the experience and needs of local people, workers and businesses. Without clarity on how the Vision's were developed, it is also hard to assess the validity of certain assertions, e.g. where local parades of shops are set out as valued this risks implying that some parades are less valued.

#### Policy objection

I do not consider this policy sound because it is not positively prepared as it is not set out how the local community has been involved in defining the Area Vision.

#### The Camberwell Identity Group NSPPSV472.2

Not positively prepared or effective.

There are a number of omissions from the Area Vision.

- a) There should be mention in what Camberwell is (in addition to what should be 'University of the Arts') of Camberwell as a vibrant home for the visual arts (South London Gallery many studios, festivals and other community events) and the performing arts (two community theatres).
- b) It is not clear what is meant by 'improve ... the road layout'. The main roads to be improved are the two A roads which cross at Camberwell Green. Reduction in traffic and improvements to these can only be achieved by working actively with others such as TFL. Unless traffic volumes are reduced, the introduction of wider pavements and cycle lanes will only result in even more congestion and pollution.
- c) The improvement of the junction should also include ambitions to: improve the aesthetics of this gateway location to help build pride in the area; and put pedestrians first by installing a diagonal crossing.
- d) It is our understanding that the whole of London is a Restricted Area which means large HGV's are not supposed to enter at all. Camberwell suffers a main artery to Dover / West End. The plan should set out what

It is not the intention of the Area Visions to go into great detail. Site allocations where relevant consider further details and requirements of the sites. Other policies in the Plan set out requirements for development coming forward to address the issues set out, where these are required within a Local Plan.

Southwark plans to do to fully ban / manage HGVs for instance, by undertaking to establish distribution sites outside the Restricted Area.

e) Acknowledging the difficulties of reducing pollution on Camberwell roads, the council should introduce carbon capturing features. Examples are Green solutions city tree outside the Tiger pub and on Camberwell Green, or Living Wall at elephant and castle (which could be planted with a Camberwell C shape – developed following community research by the Identity Group - integral to the design and placed on the wall above Card Corner).

f) There is also a need to improve safety and reduce congestion on Coldharbour Lane.

g) There should be reference to the South London Gallery as a key visitor attraction.

h) There should be reference to the diverse and international restaurants, bars and pubs, and the parks and greens spaces in the area. These were identified in our Identity Group residents survey and ongoing feedback as some of the ‘best’ elements of Camberwell, and therefore something to support and develop.

i) Improving the town centre and streetscape should i) include consideration of artworks and creative installation to reflect the creative nature of the area and build pride; ii) be undertaken with input from the community and the Camberwell Identity Group, who have consulted the community to understand people’s perceptions of Camberwell and used this to develop activity to strengthen the area’s profile and visual environment including creating street banners and a range of branded assets to champion local businesses, and iii) should not be limited to the areas identified on the Area Vision map.

j) Litter, cleanliness and rubbish management on streets was identified in our survey as some of the ‘worst’ things about Camberwell. These should be addressed in the plan.

k) It is not clear what enhancing the historic environment would entail. It should include support for championing and protecting historic sites to support the area and encourage engagement with local businesses and facilities.

<p>l) There should be reference to improving air quality and reducing pollution which is at very high levels in the town centre; and increasing 'greening' to reduce the effects of pollution.</p> <p>m) No mention of reducing carbon and improving the quality of existing buildings eg double glazing, insulation etc.</p> <p>n) On Growth Opportunities, there is no mention about the type of increased employment floor space. Camberwell is in danger of losing many of the facilities which are affordable for small businesses. It is not a suitable location for large scale office development, but given the recent pandemic changes there are opportunities for providing local support spaces for people who are avoiding commuting into the city or need affordable start up space. As referenced above, it is not clear how the content of the plan delivers the Area Vision.</p> <p>Policy objection I do not consider this policy sound because it is not positively prepared or effective</p> <p>Policy support I support the inclusion of the night time economy as a defining characteristics. I support provision of the new rail station.</p>	
<p><b>The Camberwell Society 's Representation</b> <b>NSPPSV365.18</b></p> <p>AV.05 Camberwell Area Vision and site allocations NSP 21 - NSP 33</p> <p>4.1 The Camberwell Society makes no representations on Policy AV.05 or on site allocations NSP21 – NSP33 (in Camberwell) at the present time.</p> <p>4.2 The Camberwell Society does not find anything objectionable in Area Vision 05 but it does not consider that vision exhaustive either.</p> <p>4.3 The Camberwell Society notes that, in the government's Indices of Deprivation (2019 and 2015) (<a href="http://dclgapps.communities.gov.uk/imd/ioid_index.html">http://dclgapps.communities.gov.uk/imd/ioid_index.html</a>), the heart of Camberwell (Camberwell Green ward) was ranked among the 10% most deprived neighbourhoods in the country in 2015 and among the 20% most deprived neighbourhoods in 2019. While improvement has been</p>	<p>Noted.</p>

demonstrated, there is still a great deal more need of 'regeneration that works for all' here.

4.4 Over the course of 2021, the Camberwell Society will be putting its efforts into creating a Neighbourhood Plan to provide the overall strategic vision it seeks for the area, a detailed development steer for key sites within the SE5 postcode, and the design codes which will help deliver it all, in anticipation of the planning changes trickling down from the new London Plan and the Planning White Paper.



Representation	Officer Response
NSP21 Camberwell Station	
<p data-bbox="181 352 645 424">Camberwell Society's Representation NSPPSV365.19</p> <p data-bbox="181 464 1099 1142">           AV.05 Camberwell Area Vision and site allocations NSP 21 - NSP 33            4.1 The Camberwell Society makes no representations on Policy AV.05 or on site allocations NSP21 – NSP33 (in Camberwell) at the present time.            4.2 The Camberwell Society does not find anything objectionable in Area Vision 05 but it does not consider that vision exhaustive either.            4.3 The Camberwell Society notes that, in the government’s Indices of Deprivation (2019 and 2015) (<a href="http://dclgapps.communities.gov.uk/imd/iod_index.html">http://dclgapps.communities.gov.uk/imd/iod_index.html</a>), the heart of Camberwell (Camberwell Green ward) was ranked among the 10% most deprived neighbourhoods in the country in 2015 and among the 20% most deprived neighbourhoods in 2019. While improvement has been demonstrated, there is still a great deal more need of ‘regeneration that works for all’ here.            4.4 Over the course of 2021, the Camberwell Society will be putting its efforts into creating a Neighbourhood Plan to provide the overall strategic vision it seeks for the area, a detailed development steer for key sites within the SE5 postcode, and the design codes which will help deliver it all, in anticipation of the planning changes trickling down from the new London Plan and the Planning White Paper.         </p>	<p data-bbox="1126 392 1402 424">Representation noted</p>

Representation	Officer Response
<p data-bbox="181 312 539 347">NSP22 Burgess Business Park</p> <p data-bbox="181 352 645 421">Q Square on behalf of Vision Develop NSPPSV462.2</p> <p data-bbox="181 459 1115 564">We note the proposed amendments to Draft Site Allocation NSP22 under the Site Requirements section, which is contained below in Image 1. (Please refer to full rep for images)</p> <p data-bbox="181 569 1115 887">As highlighted in Image 1, the requirements of the draft Site Allocation appear to have been amended. Under the previous version of the draft Local Plan it was sought that mixed-use development on the wider Burgess Business Park should re-provide the same amount of employment floorspace or provide 50% of any new floorspace for employment use, whichever is greater. However, with the proposed amendments to the Submission Version of the draft document, the requirement has been amended so that redevelopment should increase or provide the same amount of employment floorspace (B use class) as currently on site.</p> <p data-bbox="181 892 1115 1286">It is considered that this proposed amendment is appropriate and is supported by Vision Develop. This new approach will help to ensure the deliverability of the wider Site Allocation. Indeed, Vision Develop’s concern is that the high requirement for significant employment floorspace provision at 50% of the total floorspace (in the previous version of the draft New Southwark Plan), could have resulted in some of the sites within NSP22 not being deliverable on the grounds of financial viability. This is due to the lower levels of returns on commercial floorspace and the financial cost of delivering a significant quantum of it. This could have been exacerbated by the possibility of a lack of demand (and therefore lack of financial return) due to the high level of supply of employment floorspace within the area.</p> <p data-bbox="181 1291 1115 1422">Notwithstanding this, due to the financial implications of providing a high level of employment floorspace, it would also have raised concerns about the potential for maximising affordable housing delivery (as per draft Policy SP1), due to the financial constraints explained above.</p>	<p data-bbox="1126 459 1413 488">Representation noted.</p> <p data-bbox="1126 528 2060 887">The design and accessibility guidance still sets out that the amount of small business space will represent at least 50% of the proposed floorspace. This is relevant to the site overall, taking into account some sites within the allocation that have been redeveloped already or are under construction for employment uses only. With the policy requirement to reprovide or uplift employment space on the site it is considered the ambition of the whole site to achieve 50% employment space overall could be met. However the site requirements are clear for individual development proposals to increase or provide at least the same amount of employment floorspace on the site, and as noted in the schedule of changes this part of the policy was amended.</p>

We note that the reason for this amendment to NSP22 was because of the Burgess Business Park appeal decision. This is clarified in the New Southwark Plan Schedule of Changes (August 2020) – the relevant extract is in Image 2 below. (Please refer to email number 39 in the consultation responses folder for images)

The approach to re-providing existing floorspace is also consistent with the London Plan approach in draft Policy E7 which seeks ‘no net loss of industrial floorspace’.

However, we note within the ‘Design and Accessibility Guidance’ section that draft Site Allocation NSP22 continues to identify 50% provision of commercial floorspace as small business space. This appears to conflict with the requirement within the ‘Site Requirements’ section of the draft Site Allocation, the Burgess Business Park appeal decision and the draft New London Plan.

We assume that this inclusion is an oversight and kindly request that it is amended in line with the other recent proposed amendments to NSP22 which seek at least the same re-provision of floorspace. However, if this is not an oversight, identifying the provision of 50% of floorspace for small business uses, is not considered to be ‘sound’ for the following reasons:

☒ Justified: the requirement for 50% of floorspace for small business uses appears to be an arbitrary quantum of re-provision, which has not been specifically justified in the Council’s evidence base. Instead a like-for-like re-provision is founded on the basis of ensuring that there is no loss of employment capacity within the Borough;

☒ Effective: as outlined above, the requirement for 50% of floorspace for small business uses could result in some of the sites within NSP22 not being deliverable on the grounds of financial viability. This is due to the lower levels of returns on commercial floorspace and the financial cost of delivering a significant quantum of it. This could be exacerbated by the possibility of a lack of demand (and therefore lack of financial return) due to the high level of supply of employment floorspace within the area. Notwithstanding this, due to the financial implications of providing a high level of employment floorspace, it could also raise concerns about the potential for maximising

<p>affordable housing delivery due to the financial constraints explained above;</p> <p>☑ Consistent with national policy: As outlined above, Draft New London Plan policies identify re-provision of existing employment capacity. The requirement for 50% provision of employment space for small business uses is not consistent with this GLA policy.</p> <p>For the above reasons, we consider that if the inclusion of the requirement for 50% of the proposed floorspace to be for small business use within the 'Design and Accessibility Guidance' to not be an 'oversight' and be retained within the draft Site Allocation NSP22, that this requirement is not 'sound' for the reasons outlined above.</p>	
<p>The Camberwell Society NSPPSV472.8</p> <p>Burgess Business Park Not positively prepared or effective. Design and accessibility guidance: There should be no negative impacts e.g. loss of sunlight, daylight, change in wind patterns from new development on the adjacent park. Policy objection I do not consider this policy sound because it is not positively prepared or effective</p>	<p>Representation noted.</p> <p>Any development on the site allocation will adhere to the policies, such as the design policies under SP2, outlined in the rest of the NSP. The site allocations are therefore not providing specific detailed requirements to allow for flexibility in design.</p>
<p>The Camberwell Society NSPPSV472.20</p> <p>AV.05 Camberwell Area Vision and site allocations NSP 21 - NSP 33 4.1 The Camberwell Society makes no representations on Policy AV.05 or on site allocations NSP21 – NSP33 (in Camberwell) at the present time. 4.2 The Camberwell Society does not find anything objectionable in Area Vision 05 but it does not consider that vision exhaustive either. 4.3 The Camberwell Society notes that, in the government's Indices of Deprivation (2019 and 2015)</p>	<p>Representation noted.</p>

([http://dclgapps.communities.gov.uk/imd/iod\\_index.html](http://dclgapps.communities.gov.uk/imd/iod_index.html)), the heart of Camberwell (Camberwell Green ward) was ranked among the 10% most deprived neighbourhoods in the country in 2015 and among the 20% most deprived neighbourhoods in 2019. While improvement has been demonstrated, there is still a great deal more need of 'regeneration that works for all' here.

4.4 Over the course of 2021, the Camberwell Society will be putting its efforts into creating a Neighbourhood Plan to provide the overall strategic vision it seeks for the area, a detailed development steer for key sites within the SE5 postcode, and the design codes which will help deliver it all, in anticipation of the planning changes trickling down from the new London Plan and the Planning White Paper.

HTA Planning  
NSPPSV530.2

The previous comments which were submitted referred to the 'NSP23' site allocation, which has since been renamed to 'NSP22'. The references to NSP23 should therefore be replaced with NSP22, which refers to Burgess Business Park in line with the most recent version of the NSP.

Joseph Homes fully support the Council's ambition to deliver a new and vibrant mixed-use neighbourhood in this part of the Borough and believe that planning to provide employment space for a diverse and balanced range of occupiers can help the Council achieve this ambition. Joseph Homes also supports the ambitions to enhance permeability, including creating a north-south green link, and public realm improvements which extend to greater planting along Parkhouse Street.

The current version of this draft policy now includes an indicative residential capacity of 681 homes across the four sites within the wider business park which comprise the NSP22 allocation (21-23 Parkhouse Street, 25-33 Parkhouse Street, 35-39 Parkhouse Street and the Land at Burgess Business Park). The indicative residential capacity for the site at 25-33 Parkhouse Street is 128 homes, as set out within Table 3 of Annex 2 of the draft Plan.

Representation noted.

Viability testing has been undertaken in the [2019 viability assessment](#) which considers the viability of affordable housing and affordable workspace. A [viability background paper](#) has also been prepared which sets out the S106 requirements and how this is being secured in schemes.

Policy P17 sets out that development maximises the efficient use of land. Policy P14 sets out the requirements of residential design. This includes development to achieve an exemplary standard of residential design. Consideration needs to be given to the site context, impact on the amenity of adjoining occupiers and the quality of accommodation. Policy P2 sets out the housing mix requirements. Therefore it is not necessary to expand in the site allocations.

This reflects the number of homes proposed in planning application 20/AP/0858.

This indicative capacity for the NSP22 site allocation recognises the strong need for housing in this part of the Borough, and that such capacity can be delivered through careful co-location with the industrial uses which are to be re-provided in accordance with the policy. The indicative quantum of homes also provides a useful benchmark for the overall scale of development, including taller buildings, which the Council has identified as potentially appropriate and thus is seeking to achieve in this location.

Though the changes to this policy are welcomed, there remains an absence of up-to-date supporting viability information to support this policy. The most recent viability testing which the Council undertook was in 2017, which was the Housing Policy Viability Update Study, which built upon the original research undertaken in 2015. Neither the original 2015 Study or 2017 Update Study could have accounted for the economic and political uncertainty, and changes to the markets for housing and commercial/industrial uses, which has arisen since then.

Paragraph 123 of NPPF states that Councils are required to contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. In accordance with this requirement, we suggest wording is included within the NSP 23 allocation text to reinforce this overarching national principle to the following effect:

‘Redevelopment of the site must:

- Ensure every individual development proposal increases or provides at least the amount of employment floorspace (B class) currently on the site; and
- Provide new homes (C3) of a mix, density and quality that are appropriate to ensure the optimization of the site within its surrounding context; and
- Enhance permeability including new north-south and east-west green links; and
- Provide public realm improvements including a square’.

JH Parkhouse Ltd also strongly supports the Council’s approach to tall buildings within the site allocation, and the suggestion of considering each

case on its own merit within the wider townscape and heritage context. This echoes the sentiment of paragraph 123 within the NPPF which advises that Council's should refuse applications that do not make efficient use of the land. In order to ensure consistency, reference should also be made to the emerging Parkhouse Street Local Development Study (latest draft published October 2020), which identifies an opportunity within the site allocation for taller landmark buildings adjacent to the key pedestrian link into the Park and fronting the Park.

In summary, JH Parkhouse Ltd supports the aspiration to deliver mixed-use development in the Borough however we consider the policy should be further strengthened in order to optimise this brownfield site. To support this aspiration, we suggest that further viability testing should be undertaken to ensure that the Council has a robust evidence base which sufficiently reflects the proposed policy requirements, indicative housing capacity and the vision for the design of these schemes, to ensure that the aspiration is deliverable.

I trust the above outlines JH Parkhouse Ltd comments on the emerging New Southwark Plan clearly

Representation	Officer Response
NSP23 Butterfly Walk, Morrisons Car Park and Police Station	
<p data-bbox="181 352 645 424"><b>Camberwell Society's Representation</b> NSPPSV365.21</p> <p data-bbox="181 464 987 496">AV.05 Camberwell Area Vision and site allocations NSP 21 - NSP 33</p> <p data-bbox="181 499 1099 568">4.1 The Camberwell Society makes no representations on Policy AV.05 or on site allocations NSP21 – NSP33 (in Camberwell) at the present time.</p> <p data-bbox="181 571 1055 639">4.2 The Camberwell Society does not find anything objectionable in Area Vision 05 but it does not consider that vision exhaustive either.</p> <p data-bbox="181 643 1025 711">4.3 The Camberwell Society notes that, in the government's Indices of Deprivation (2019 and 2015)</p> <p data-bbox="181 715 1077 927">(http://dclgapps.communities.gov.uk/imd/iod_index.html), the heart of Camberwell (Camberwell Green ward) was ranked among the 10% most deprived neighbourhoods in the country in 2015 and among the 20% most deprived neighbourhoods in 2019. While improvement has been demonstrated, there is still a great deal more need of 'regeneration that works for all' here.</p> <p data-bbox="181 930 1115 1142">4.4 Over the course of 2021, the Camberwell Society will be putting its efforts into creating a Neighbourhood Plan to provide the overall strategic vision it seeks for the area, a detailed development steer for key sites within the SE5 postcode, and the design codes which will help deliver it all, in anticipation of the planning changes trickling down from the new London Plan and the Planning White Paper.</p>	<p data-bbox="1126 464 1413 496">Representation noted.</p>



Representation	Officer Response
NSP24 Valmar Trading Estate	
<p data-bbox="181 352 645 424">Camberwell Society's Representation NSPPSV365.22</p> <p data-bbox="181 464 987 496">AV.05 Camberwell Area Vision and site allocations NSP 21 - NSP 33</p> <p data-bbox="181 499 1099 568">4.1 The Camberwell Society makes no representations on Policy AV.05 or on site allocations NSP21 – NSP33 (in Camberwell) at the present time.</p> <p data-bbox="181 571 1055 639">4.2 The Camberwell Society does not find anything objectionable in Area Vision 05 but it does not consider that vision exhaustive either.</p> <p data-bbox="181 643 1025 711">4.3 The Camberwell Society notes that, in the government's Indices of Deprivation (2019 and 2015)</p> <p data-bbox="181 715 1077 927">(http://dclgapps.communities.gov.uk/imd/iod_index.html), the heart of Camberwell (Camberwell Green ward) was ranked among the 10% most deprived neighbourhoods in the country in 2015 and among the 20% most deprived neighbourhoods in 2019. While improvement has been demonstrated, there is still a great deal more need of 'regeneration that works for all' here.</p> <p data-bbox="181 930 1115 1142">4.4 Over the course of 2021, the Camberwell Society will be putting its efforts into creating a Neighbourhood Plan to provide the overall strategic vision it seeks for the area, a detailed development steer for key sites within the SE5 postcode, and the design codes which will help deliver it all, in anticipation of the planning changes trickling down from the new London Plan and the Planning White Paper.</p>	<p data-bbox="1128 464 1413 496">Representation noted.</p>

Representation	Officer Response
<p data-bbox="188 316 560 347">NSP25 Camberwell Bus Garage</p> <p data-bbox="188 355 430 419">TfL Spatial Planning NSPPSV181.14</p> <p data-bbox="188 464 1108 1214">NSP25 – Camberwell Bus Garage Although there may be potential for future redevelopment or reconfiguration while retaining operational bus garage uses on this site, we are concerned about the proposed wording that has been inserted which states: ‘If the bus garage is required redevelopment should consider over the station development to provide new homes’. This wording is inconsistent with policy T3 in the ItPLP which requires development plans to safeguard existing land and buildings used for public transport, active travel or related support functions. The proposed wording does not recognise the need to retain bus garage capacity to maintain the local bus network. These bus garages, whether they are owned by TfL or third parties, are required, and the wording should acknowledge this. It should also be made clear that any over-site development must retain or increase the existing vehicle capacity, ensure continuity of operation during construction, meet existing and future operational needs including 24/7 operation by a full range of vehicles including electric charging, and be the subject of approval by TfL to ensure that it meets the standard requirements for an operational bus garage. If garage capacity were lost as a result of a proposed redevelopment (including on a temporary basis), at least equivalent capacity would need to be provided within the local area and agreed with TfL prior to any redevelopment.</p>	<p data-bbox="1140 464 2042 528">The site allocation sets out the development must retain a bus garage if the use is still required.</p> <p data-bbox="1140 571 2049 671">When redevelopment of the site comes forward, consideration will be given to the need for the station and how this will function during any redevelopment.</p>
<p data-bbox="188 1257 573 1321">The Camberwell Identity Group NSPPSV472.9</p> <p data-bbox="188 1364 622 1428">Camberwell Bus Garage Not positively prepared or effective.</p>	<p data-bbox="1140 1364 2042 1428">Noted. Any redevelopment of the site, to include the bus garage or not, will be subject to public consultation.</p>

Omission of the bus garages must be demonstrated and such demonstration should not include increased parking of buses on public highways or reduction of routes. (Note: there is already a pollution problem caused by buses parked at Camberwell Green).

Policy objection

I do not consider this policy sound because it is not positively prepared or effective

Representation	Officer Response
<p data-bbox="188 317 566 347">NSP26 Abellio Walworth Depot</p> <p data-bbox="188 357 551 421">TfL Commercial Development NSPPSV182.3</p> <p data-bbox="188 466 1093 529">NSP26: Abellio Walworth Depot, Camberwell (Formerly NSP27 Abellio Bus Garage, Camberwell)</p> <p data-bbox="188 539 1093 746">The proposed wording is not sufficiently clear and although TfL CD continue to suggest that in any future redevelopment the delivery of housing should be prioritised, bullet point one of 'Site Requirements' should acknowledge TfL's authority in determining the redevelopment of this site and deciding whether the site is still required for bus garage use. At the current time the site is still required for an operational bus garage:</p> <p data-bbox="188 756 1093 890">Retain the bus garage if the use is determined by TfL to still be required. If the bus garage is surplus to requirements; If at some point in the future the bus garage is determined by TfL to be surplus to requirements, then the equivalent space should be provided as new homes</p>	<p data-bbox="1140 466 2045 564">The site allocation sets out the development must retain a bus garage if the use is still required. Any redevelopment of the site will require consultation with the relevant stakeholders and consultees.</p>
<p data-bbox="188 936 432 1000">TfL Spatial Planning NSPPSV181.15</p> <p data-bbox="188 1045 584 1075">NSP26 – Abellio Walworth Depot</p> <p data-bbox="188 1085 1111 1431">Although there may be potential for future redevelopment or reconfiguration while retaining operational bus garage uses on this site, we are concerned about the proposed wording that has been inserted which states: 'If the bus garage is required redevelopment should consider over the station development to provide new homes'. This wording is inconsistent with policy T3 in the ItPLP which requires development plans to safeguard existing land and buildings used for public transport, active travel or related support functions. The proposed wording does not recognise the need to retain bus garage capacity to maintain the local bus network. These bus garages, whether they are owned by TfL or third parties, are required, and</p>	<p data-bbox="1140 1045 2045 1144">The site allocation sets out the development must retain a bus garage if the use is still required. Any redevelopment of the site will require consultation with the relevant stakeholders and consultees.</p> <p data-bbox="1140 1189 2045 1287">When redevelopment of the site comes forward, consideration will be given to the need for the station and how this will function during any redevelopment.</p>

<p>the wording should acknowledge this. It should also be made clear that any over-site development must retain or increase the existing vehicle capacity, ensure continuity of operation during construction, meet existing and future operational needs including 24/7 operation by a full range of vehicles including electric charging, and be the subject of approval by TfL to ensure that it meets the standard requirements for an operational bus garage. If garage capacity were lost as a result of a proposed redevelopment (including on a temporary basis), at least equivalent capacity would need to be provided within the local area and agreed with TfL prior to any redevelopment.</p>	
<p><b>The Camberwell Identity Group</b> NSPPSV472.10</p> <p>Abellio Walworth Depot Not positively prepared or effective. Omission of the bus garages must be demonstrated and such demonstration should not include increased parking of buses on public highways or reduction of routes. (Note: there is already a pollution problem caused by buses parked at Camberwell Green). Policy objection I do not consider this policy sound because it is not positively prepared or effective</p>	<p>Noted. Any redevelopment of the site, to include the bus garage or not, will be subject to public consultation.</p>
<p><b>Camberwell Society's Representations</b> NSPPSV365.24</p> <p>AV.05 Camberwell Area Vision and site allocations NSP 21 - NSP 33 4.1 The Camberwell Society makes no representations on Policy AV.05 or on site allocations NSP21 – NSP33 (in Camberwell) at the present time. 4.2 The Camberwell Society does not find anything objectionable in Area Vision 05 but it does not consider that vision exhaustive either. 4.3 The Camberwell Society notes that, in the government's Indices of</p>	<p>Representation noted.</p>

#### Deprivation (2019 and 2015)

([http://dclgapps.communities.gov.uk/imd/iod\\_index.html](http://dclgapps.communities.gov.uk/imd/iod_index.html)), the heart of Camberwell (Camberwell Green ward) was ranked among the 10% most deprived neighbourhoods in the country in 2015 and among the 20% most deprived neighbourhoods in 2019. While improvement has been demonstrated, there is still a great deal more need of 'regeneration that works for all' here.

4.4 Over the course of 2021, the Camberwell Society will be putting its efforts into creating a Neighbourhood Plan to provide the overall strategic vision it seeks for the area, a detailed development steer for key sites within the SE5 postcode, and the design codes which will help deliver it all, in anticipation of the planning changes trickling down from the new London Plan and the Planning White Paper.

Representation	Officer Response
<p data-bbox="185 316 969 344">NSP27 Land Between Camberwell Station Road and Warner Road</p> <p data-bbox="185 355 573 419">The Camberwell Identity Group NSPPSV472.11</p> <p data-bbox="185 464 1093 671">Not positively prepared or effective. Is further retail on the street frontage really viable given the units that have remained vacant further up the road? Policy objection I do not consider this policy sound because it is not positively prepared or effective</p>	<p data-bbox="1137 427 1413 456">Representation noted.</p> <p data-bbox="1137 499 2065 635">NSP27 is located in a District Town Centre. Policy P34 Town and local centres aims to retain retail shopping frontages. This is to ensure that we maintain our town centres as lively and interesting places. Town centres should be the focus of commercial activity.</p>
<p data-bbox="185 719 645 783">Camberwell Society's Representation NSPPSV365.25</p> <p data-bbox="185 826 1115 1426">AV.05 Camberwell Area Vision and site allocations NSP 21 - NSP 33 4.1 The Camberwell Society makes no representations on Policy AV.05 or on site allocations NSP21 – NSP33 (in Camberwell) at the present time. 4.2 The Camberwell Society does not find anything objectionable in Area Vision 05 but it does not consider that vision exhaustive either. 4.3 The Camberwell Society notes that, in the government's Indices of Deprivation (2019 and 2015) (<a href="http://dclgapps.communities.gov.uk/imd/iod_index.html">http://dclgapps.communities.gov.uk/imd/iod_index.html</a>), the heart of Camberwell (Camberwell Green ward) was ranked among the 10% most deprived neighbourhoods in the country in 2015 and among the 20% most deprived neighbourhoods in 2019. While improvement has been demonstrated, there is still a great deal more need of 'regeneration that works for all' here. 4.4 Over the course of 2021, the Camberwell Society will be putting its efforts into creating a Neighbourhood Plan to provide the overall strategic vision it seeks for the area, a detailed development steer for key sites within the SE5 postcode, and the design codes which will help deliver it all, in anticipation of</p>	<p data-bbox="1137 826 1413 855">Representation noted.</p>

the planning changes trickling down from the new London Plan and the Planning White Paper.



Representation	Officer Response
NSP28 Iceland, 120-132 Camberwell Road	
<p data-bbox="181 352 658 387">Camberwell Society's Representations</p> <p data-bbox="181 387 371 422">NSPPSV365.26</p> <p data-bbox="181 464 987 499">AV.05 Camberwell Area Vision and site allocations NSP 21 - NSP 33</p> <p data-bbox="181 499 1099 568">4.1 The Camberwell Society makes no representations on Policy AV.05 or on site allocations NSP21 – NSP33 (in Camberwell) at the present time.</p> <p data-bbox="181 568 1057 636">4.2 The Camberwell Society does not find anything objectionable in Area Vision 05 but it does not consider that vision exhaustive either.</p> <p data-bbox="181 636 1028 705">4.3 The Camberwell Society notes that, in the government’s Indices of Deprivation (2019 and 2015)</p> <p data-bbox="181 705 1081 927">(http://dclgapps.communities.gov.uk/imd/iod_index.html), the heart of Camberwell (Camberwell Green ward) was ranked among the 10% most deprived neighbourhoods in the country in 2015 and among the 20% most deprived neighbourhoods in 2019. While improvement has been demonstrated, there is still a great deal more need of ‘regeneration that works for all’ here.</p> <p data-bbox="181 927 1117 1142">4.4 Over the course of 2021, the Camberwell Society will be putting its efforts into creating a Neighbourhood Plan to provide the overall strategic vision it seeks for the area, a detailed development steer for key sites within the SE5 postcode, and the design codes which will help deliver it all, in anticipation of the planning changes trickling down from the new London Plan and the Planning White Paper.</p>	<p data-bbox="1126 464 1413 499">Representation noted.</p>

Representation	Officer Response
<p data-bbox="181 312 488 347">NSP29 49 Lomond Grove</p> <p data-bbox="181 352 353 424">Susan Crisp NSPPSV456.7</p> <p data-bbox="181 464 1106 639">The policy is not effective The site allocation plans for 49 Lomond Grove and 83 Lomond Grove identify the need for improved connectivity for pedestrian and cyclists. This is also an opportunity to improve green infrastructure which would include nature corridors and stepping stones.</p> <p data-bbox="181 679 1106 855">The Southwark Open Space Strategy (2013) notes that these green corridors can be developed. It also notes in the sub-area strategy for Camberwell that “Potential improvements to linkages between spaces -There is potential to improve links between Burgess Park and the smaller parks and open spaces within Camberwell.”</p> <p data-bbox="181 860 1106 963">The Open Spaces Background Paper SP601 sets out a number of suggestions for nature corridors and stepping stones, joining up major green spaces. It reiterates the proposal from the 2013 Open Spaces Strategy.</p> <p data-bbox="181 968 1106 1032">In order for this to be implemented clearer information and sign-posting of council strategy is needed.</p> <p data-bbox="181 1037 1106 1072">See comments above on Policy 58 Green Infrastructure.</p> <p data-bbox="181 1077 1106 1252">The development of these three sites provide an opportunity to deliver on additional local benefits and achieve a bigger impact across the sites together than alone delivering an integrated policy objectives. This aspiration is touched on in the Movement Plan SP506, but not developed to a specific proposal or prioritised routes.</p> <p data-bbox="181 1257 1106 1321">This joined up approach is comparable to the policy direction set out in the NSP for the Low Line Routes Policy 51.</p>	<p data-bbox="1126 464 1411 499">Representation noted.</p> <p data-bbox="1126 531 2074 707">The NSP should be read as a whole. Policy P58 Green Infrastructure sets out that large scale development must provide ‘publically accessible open space and green links’. Site allocations NSP29 and NSP30 both identify the need for improved connectivity, the design and layout of the site will be considered as development proposals come forward.</p> <p data-bbox="1126 738 2074 954">Southwark’s Open Space Strategy 2013 details a strategy for ongoing management and enhancement of open spaces. This has informed policies relating to green infrastructure in the New Southwark Plan, and a number of new developments that are proposing increased and better quality open space including the Canada Water masterplan and emerging Old Kent Road masterplan in the Old Kent Road Area Action Plan.</p>
<p data-bbox="181 1361 658 1431">Camberwell Society’s Representations NSPPSV365.27</p>	

AV.05 Camberwell Area Vision and site allocations NSP 21 - NSP 33

4.1 The Camberwell Society makes no representations on Policy AV.05 or on site allocations NSP21 – NSP33 (in Camberwell) at the present time.

4.2 The Camberwell Society does not find anything objectionable in Area Vision 05 but it does not consider that vision exhaustive either.

4.3 The Camberwell Society notes that, in the government’s Indices of Deprivation (2019 and 2015)

([http://dclgapps.communities.gov.uk/imd/iodes\\_index.html](http://dclgapps.communities.gov.uk/imd/iodes_index.html)), the heart of Camberwell (Camberwell Green ward) was ranked among the 10% most deprived neighbourhoods in the country in 2015 and among the 20% most deprived neighbourhoods in 2019. While improvement has been demonstrated, there is still a great deal more need of ‘regeneration that works for all’ here.

4.4 Over the course of 2021, the Camberwell Society will be putting its efforts into creating a Neighbourhood Plan to provide the overall strategic vision it seeks for the area, a detailed development steer for key sites within the SE5 postcode, and the design codes which will help deliver it all, in anticipation of the planning changes trickling down from the new London Plan and the Planning White Paper.

Representation noted.

Representation	Officer Response
<p data-bbox="188 317 488 344">NSP30 83 Lomond Grove</p> <p data-bbox="188 357 353 421">Susan Crisp NSPPSV456.8</p> <p data-bbox="188 466 1106 1321"> The policy is not effective  The site allocation plans for 49 Lomond Grove and 83 Lomond Grove identify the need for improved connectivity for pedestrian and cyclists. This is also an opportunity to improve green infrastructure which would include nature corridors and stepping stones.   The Southwark Open Space Strategy (2013) notes that these green corridors can be developed. It also notes in the sub-area strategy for Camberwell that “Potential improvements to linkages between spaces -There is potential to improve links between Burgess Park and the smaller parks and open spaces within Camberwell.”  The Open Spaces Background Paper SP601 sets out a number of suggestions for nature corridors and stepping stones, joining up major green spaces. It reiterates the proposal from the 2013 Open Spaces Strategy.  In order for this to be implemented clearer information and sign-posting of council strategy is needed.  See comments above on Policy 58 Green Infrastructure.  The development of these three sites provide an opportunity to deliver on additional local benefits and achieve a bigger impact across the sites together than alone delivering an integrated policy objectives. This aspiration is touched on in the Movement Plan SP506, but not developed to a specific proposal or prioritised routes.  This joined up approach is comparable to the policy direction set out in the NSP for the Low Line Routes Policy 51 </p>	<p data-bbox="1140 429 1411 456">Representation noted.</p> <p data-bbox="1140 499 2058 668">The NSP should be read as a whole. Policy P58 Green Infrastructure sets out that large scale development must provide ‘publically accessible open space and green links’. Site allocations NSP29 and NSP30 both identify the need for improved connectivity, the design and layout of the site will be considered as development proposals come forward.</p> <p data-bbox="1140 711 2058 916">Southwark’s Open Space Strategy 2013 details a strategy for ongoing management and enhancement of open spaces. This has informed policies relating to green infrastructure in the New Southwark Plan, and a number of new developments that are proposing increased and better quality open space including the Canada Water masterplan and emerging Old Kent Road masterplan in the Old Kent Road Area Action Plan.</p>
<p data-bbox="188 1366 656 1430">Camberwell Society’s Representations NSPPSV365.28</p>	

AV.05 Camberwell Area Vision and site allocations NSP 21 - NSP 33

4.1 The Camberwell Society makes no representations on Policy AV.05 or on site allocations NSP21 – NSP33 (in Camberwell) at the present time.

4.2 The Camberwell Society does not find anything objectionable in Area Vision 05 but it does not consider that vision exhaustive either.

4.3 The Camberwell Society notes that, in the government’s Indices of Deprivation (2019 and 2015)

([http://dclgapps.communities.gov.uk/imd/iodes\\_index.html](http://dclgapps.communities.gov.uk/imd/iodes_index.html)), the heart of Camberwell (Camberwell Green ward) was ranked among the 10% most deprived neighbourhoods in the country in 2015 and among the 20% most deprived neighbourhoods in 2019. While improvement has been demonstrated, there is still a great deal more need of ‘regeneration that works for all’ here.

4.4 Over the course of 2021, the Camberwell Society will be putting its efforts into creating a Neighbourhood Plan to provide the overall strategic vision it seeks for the area, a detailed development steer for key sites within the SE5 postcode, and the design codes which will help deliver it all, in anticipation of the planning changes trickling down from the new London Plan and the Planning White Paper.

Representation noted.

Representation	Officer Response
NSP31 123 Grove Park	
<p data-bbox="188 357 658 421">Camberwell Society's Representations NSPPSV365.29</p> <p data-bbox="188 464 987 491">AV.05 Camberwell Area Vision and site allocations NSP 21 - NSP 33</p> <p data-bbox="188 501 1099 564">4.1 The Camberwell Society makes no representations on Policy AV.05 or on site allocations NSP21 – NSP33 (in Camberwell) at the present time.</p> <p data-bbox="188 572 1055 636">4.2 The Camberwell Society does not find anything objectionable in Area Vision 05 but it does not consider that vision exhaustive either.</p> <p data-bbox="188 644 1025 708">4.3 The Camberwell Society notes that, in the government's Indices of Deprivation (2019 and 2015)</p> <p data-bbox="188 716 1077 924">(http://dclgapps.communities.gov.uk/imd/iod_index.html), the heart of Camberwell (Camberwell Green ward) was ranked among the 10% most deprived neighbourhoods in the country in 2015 and among the 20% most deprived neighbourhoods in 2019. While improvement has been demonstrated, there is still a great deal more need of 'regeneration that works for all' here.</p> <p data-bbox="188 932 1115 1139">4.4 Over the course of 2021, the Camberwell Society will be putting its efforts into creating a Neighbourhood Plan to provide the overall strategic vision it seeks for the area, a detailed development steer for key sites within the SE5 postcode, and the design codes which will help deliver it all, in anticipation of the planning changes trickling down from the new London Plan and the Planning White Paper.</p>	<p data-bbox="1140 464 1411 491">Representation noted.</p>

Representation	Officer Response
<p data-bbox="185 316 719 344">NSP32 Camberwell Green Magistrates Court</p> <p data-bbox="185 355 353 419">Susan Crisp NSPPSV456.9</p> <p data-bbox="185 464 1106 638">The policy is not effective The site allocation plans for 49 Lomond Grove and 83 Lomond Grove identify the need for improved connectivity for pedestrian and cyclists. This is also an opportunity to improve green infrastructure which would include nature corridors and stepping stones.</p> <p data-bbox="185 679 1106 853">The Southwark Open Space Strategy (2013) notes that these green corridors can be developed. It also notes in the sub-area strategy for Camberwell that “Potential improvements to linkages between spaces -There is potential to improve links between Burgess Park and the smaller parks and open spaces within Camberwell.”</p> <p data-bbox="185 863 1106 962">The Open Spaces Background Paper SP601 sets out a number of suggestions for nature corridors and stepping stones, joining up major green spaces. It reiterates the proposal from the 2013 Open Spaces Strategy.</p> <p data-bbox="185 971 1106 1035">In order for this to be implemented clearer information and sign-posting of council strategy is needed.</p> <p data-bbox="185 1045 1106 1074">See comments above on Policy 58 Green Infrastructure.</p> <p data-bbox="185 1083 1106 1257">The development of these three sites provide an opportunity to deliver on additional local benefits and achieve a bigger impact across the sites together than alone delivering an integrated policy objectives. This aspiration is touched on in the Movement Plan SP506, but not developed to a specific proposal or prioritised routes.</p> <p data-bbox="185 1267 1106 1331">This joined up approach is comparable to the policy direction set out in the NSP for the Low Line Routes Policy 51.</p>	<p data-bbox="1137 464 1413 493">Representation noted.</p> <p data-bbox="1137 534 2047 633">The NSP should be read as a whole. Policy P58 Green Infrastructure sets out that large scale development must provide ‘publically accessible open space and green links’.</p> <p data-bbox="1137 675 2047 882">Southwark’s Open Space Strategy 2013 details a strategy for ongoing management and enhancement of open spaces. This has informed policies relating to green infrastructure in the New Southwark Plan, and a number of new developments that are proposing increased and better quality open space including the Canada Water masterplan and emerging Old Kent Road masterplan in the Old Kent Road Area Action Plan.</p>
<p data-bbox="185 1366 656 1430">Camberwell Society’s Representations NSPPSV365.30</p>	

AV.05 Camberwell Area Vision and site allocations NSP 21 - NSP 33

4.1 The Camberwell Society makes no representations on Policy AV.05 or on site allocations NSP21 – NSP33 (in Camberwell) at the present time.

4.2 The Camberwell Society does not find anything objectionable in Area Vision 05 but it does not consider that vision exhaustive either.

4.3 The Camberwell Society notes that, in the government’s Indices of Deprivation (2019 and 2015)

([http://dclgapps.communities.gov.uk/imd/iod\\_index.html](http://dclgapps.communities.gov.uk/imd/iod_index.html)), the heart of Camberwell (Camberwell Green ward) was ranked among the 10% most deprived neighbourhoods in the country in 2015 and among the 20% most deprived neighbourhoods in 2019. While improvement has been demonstrated, there is still a great deal more need of ‘regeneration that works for all’ here.

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Representation noted.



Representation	Officer Response
NSP33 Denmark Hill Campus East	
<p data-bbox="181 352 658 424">Camberwell Society's Representations NSPPSV365.31</p> <p data-bbox="181 464 987 496">AV.05 Camberwell Area Vision and site allocations NSP 21 - NSP 33</p> <p data-bbox="181 499 1099 568">4.1 The Camberwell Society makes no representations on Policy AV.05 or on site allocations NSP21 – NSP33 (in Camberwell) at the present time.</p> <p data-bbox="181 571 1055 639">4.2 The Camberwell Society does not find anything objectionable in Area Vision 05 but it does not consider that vision exhaustive either.</p> <p data-bbox="181 643 1028 711">4.3 The Camberwell Society notes that, in the government's Indices of Deprivation (2019 and 2015)</p> <p data-bbox="181 715 1081 927">(http://dclgapps.communities.gov.uk/imd/iod_index.html), the heart of Camberwell (Camberwell Green ward) was ranked among the 10% most deprived neighbourhoods in the country in 2015 and among the 20% most deprived neighbourhoods in 2019. While improvement has been demonstrated, there is still a great deal more need of 'regeneration that works for all' here.</p> <p data-bbox="181 930 1117 1142">4.4 Over the course of 2021, the Camberwell Society will be putting its efforts into creating a Neighbourhood Plan to provide the overall strategic vision it seeks for the area, a detailed development steer for key sites within the SE5 postcode, and the design codes which will help deliver it all, in anticipation of the planning changes trickling down from the new London Plan and the Planning White Paper.</p>	<p data-bbox="1128 464 1413 496">Representation noted.</p>

Representation	Officer Response
<p><b>NSP22 – Burgess Business Park</b></p> <p>Liam Hennessy NSPPSV380.11</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 Business Park is a seriously badly designed scheme rightly rejected by the Housing Secretary as sub-standard. Needs to be emphasised that this appalling scheme was supported by Southwark's so-called 'Planners' over a period of several years - a scheme of below standard accommodation that severely harms local residents. Worth noting that this is one of at least 4 schemes bordering Burgess Park by the same architects - HTA Design. All 4 schemes harm either Burgess Park or its immediate neighbours, and all 4 schemes have been supported by Southwark's so-called 'Planners'. 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>The Burgess Business Park scheme was refused by the Council's planning committee, the refusal was successfully defended by the Council at the appeal Public Inquiry and the appeal was dismissed by the Secretary of State on grounds relating to density, standard of accommodation and design quality.</p> <p>The Council is working proactively with all adjoining landowners with live applications within the site allocation as well as consultation with the local community. 3 live schemes, as well as part of the dismissed appeal site, abut Burgess Park. The site allocation in the NSP specifically references the value of Burgess Park and how green links should be established into Burgess Park opening up access for new and existing residents with improved public realm across the site. The relationship of the site allocation and planning applications submitted adjacent to the boundary of Burgess Park will be an important consideration in the ongoing dialogue with landowners and the determination of planning applications in this location.</p>
<p><b>Harri Aston DP9 – Camberwell Union</b> <b>NSPPSV514</b></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? No Do you consider this policy is sound? No Do you consider this policy is sound? - why not sound - Justified</p>	<p>Point 1 The site allocation in the NSP only references approved planning applications, which is consistent across site allocations in the whole plan. The site allocations methodology paper (EIP82) identifies the appeal site and lists all current live applications as well as information on the dismissed appeal application on Burgess Business Park, including the map boundary of the application on the plan. The dismissed appeal is a material consideration in</p>

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

Consistent with national policy and the London Plan

Positively Prepared

Indicative residential capacity

Generally supportive of the addition of indicative residential capacity to the site allocation document which is helpful. As the largest site within the allocation area, the Camberwell Union scheme would contribute to delivering most of the units across the allocation which in turn would contribute significantly to the Borough's housing targets.

Planning History

The site allocation document references and acknowledges other applications in the site allocation (namely 17/AP/4381 and 17/AP/4778) but does not reference planning application 17/AP/4797 and subsequent appeal decision ref: APP/A5840/W/19/3225548 which relates the largest individual site within the allocation. Whilst the above application was refused at appeal by the Secretary of State (SoS), the decision does set out the design amendments which could be made to make the proposals for relevant part of the site allocation acceptable in planning terms. If the site allocation seeks to list relevant planning applications, then the above should be included too particularly given the appeal decision is a legal direction and a material consideration in relation to the determination of any future application within the relevant part of the site allocation.

Subsequently, it is not considered that the site allocation document is legally compliant or sound on this matter as it fails to reference important planning history considerations which are relevant to future development proposals emerging within the area.

Commercial, Employment and Industrial Floorspace

The site allocation document suggests that every individual development proposal must increase or provide at least the amount of employment floorspace currently on site.

In the context of planning application 17/AP/4797 and subsequent appeal decision ref: APP/A5840/W/19/3225548, this is at odds with the findings of the planning inspectorate and SoS who noted that the introduction of a

any future application and consideration of the site allocation.

Point 2

The changes to the NSP site allocation in August 2020 took account of the appeal decision. The policy now makes it clearer what is expected on individual site proposals within the site allocation as there are multiple landowners. This approach is consistent with other site allocations and the requirements of Policy P29. The site allocation removes the requirement for 50% of the site to be employment floorspace in the development requirements section. It is still acknowledged in the design guidance taking account of the Inspector's comments that this could relate to the whole site. It is likely that with re-provision of employment floorspace on individual development proposals across the site and the two industrial schemes that have recently been constructed that 50% small business space would be represented across the whole site.

The SoS Directions to the New London Plan have changed the approach to policies E4-E7 requiring the removal of the requirement to achieve no net loss industrial floorspace capacity in the borough. The site is currently designated as a Local PIL and the council proposes to remove this designation in the NSP. This is in accordance with the principles of Policy E4 Part C which requires any release of industrial land to achieve wider planning objectives should be facilitated through the processes of industrial intensification, co-location and substitution as set out in Policy E7. The release and proposal for mixed use development is justified by using a plan-led process in terms of setting out requirements in the site allocation. The site allocation requires re-provision of employment floorspace and that redevelopment should provide industrial uses. The re-provision of employment floorspace is also informed by Policy P29 that the type of employment floorspace must meet market demand. Current market demand is established in evidence base document SP431 and strong demand for industrial floorspace is also established in the appeal decision. This justifies the 'should' requirement in

predominately residential led development would not have a detrimental effect on the Borough's stock of employment and that the provision of 4,404sqm commercial floorspace (which is less than currently on site) would result in significant increase in number of available jobs relative to what currently exists at the site.

Please see below the relevant extracts from the planning inspectors report on this issue:

Para 382: The majority of the site is within, and comprises a large part of, the Parkhouse Street PIL. It is the only such Borough designation outside the Old Kent Road Action Area and the existing industrial and warehousing uses are protected in the development plan through saved policy 1.2 in the Southwark Plan and Strategic Policy 10 in the CS. Insofar as other uses are proposed to be introduced, most notably residential, the appeal development would conflict with the development plan in this respect.

Para 387: The overall Class B floorspace in the PIL was 23,317.6m<sup>2</sup> prior to recent redevelopments, most notably the Big Yellow self-storage development, which have resulted in a substantial increase. This means that if the appeal development were to go ahead the net loss of Class B floorspace in the PIL would only be 2,870m<sup>2</sup>. If the 10-12 Parkhouse Street were also to be removed from the calculation, the loss to the allocation would be just 766m<sup>2</sup>. This would be a relatively small proportion of the total in the PIL. When considering the amount of B Class floorspace that must be provided in any redevelopment scheme, the draft allocation expresses no preference between total re-provision and 50% of the development floorspace. The appeal proposal would not comply with either alternative. However, on a fair reading of the emerging policy it seems to me that the conflict that would arise would be relatively small.

In the planning balance section of the report the inspector reaches the following conclusion on this matter:

Para 501: The appeal scheme would provide new, good quality Class B premises, 10% of which would be affordable workspace for small businesses. There would be a significant increase in the number of available jobs relative to what currently exists at the site. This would also exceed the jobs that could

the site allocation to provide industrial floorspace, however there is also sufficient flexibility in the policy to ensure future provision continues to meet market demand.

The Inspector noted in her decision that "there was no evidence that a redevelopment with B classes would not be viable and I consider that it is not unreasonable to surmise that a scheme of about 8,502m<sup>2</sup> could be provided" (para 401). This was based on detailed site circumstances as outlined in the appeal decision. This figure is more than double the employment floorspace proposed and just less than double the amount of total non-residential floorspace proposed in the appeal scheme. It would also be closer to achieving the re-provision of employment floorspace on the site as the policy requires, depending on site-specific circumstances including viability, and the changes that have been made to the New London Plan since the decision was issued, which would be discussed in more detail in any future application.

For these reasons outlined above and in combination with the changes made to the policy since the appeal was issued and changes made to the New London Plan the policy is sound.

### Point 3

The council will respond to the Inspectors in advance of the Examination on required changes as a result of the changes to the Use Classes Order. The council would use conditions to secure specific uses as required on site allocations if considered necessary, particularly where bespoke design is necessary, for example for light industrial uses, to ensure they are delivered for their specific purpose.

reasonably be provided if it were to be redeveloped for industrial purposes. These would be benefits of significant weight.

In addition to the appeal decision, it is important to note that the above position on industrial/employment floorspace provision is supported by fundamental changes which are proposed to the strategic planning policies within the emerging London Plan.

Within the Sos's letter to the Mayor of London (MoL) whereby the formal adoption of the intend to publish London Plan was blocked, the approach to the plans industrial land policies was heavily scrutinised.

The relevant paragraph of the Sos's letter to the MoL is provided below for clarity:

“Planning clearly requires a judgement to be made about how to use land most efficiently, enabling sufficient provision for housing, employment and amenity. The Inspectors considered your industrial land policies to be unrealistic; taking an over-restrictive stance to hinder Boroughs' abilities to choose more optimal uses for industrial sites where housing is in high demand. I am directing you to take a more proportionate stance - removing the 'no net loss' requirement on existing industrial land sites whilst ensuring Boroughs bring new industrial land into the supply”

On the above basis, it is evident that in requiring development within the site allocation to re-provide the amount of floorspace currently on site, the site allocation document does not coincide with the above assertions by the government that onerous commercial/industrial floorspace re-provision policies ultimately hinder the ability for land to be used effectively and to be brought forward for much needed meaningful uses such as residential, improved employment and amenity.

Moreover, it is worth noting that as a part of the original evidence base for the preparation of the New Southwark Plan, Burgess Business Park was intended to be released from an industrial designation to allow for its mixed-used re-development.

The relevant paragraph of the New Southwark Plan Background Paper on Industrial land (December 2019) is provided below for clarity:

“The only remaining locally designated preferred industrial site outside of the

Old Kent Road is the Burgess Business Park, Parkhouse Street site in Camberwell. The site is proposed to be released from industrial designation and proposed for mixed use development. This was the recommended approach in the various evidence base studies supporting the New Southwark Plan”

Therefore, in summary and in the context of the above it is well documented that the approach to and the provision of 4,404sqm commercial floorspace was supported by the planning inspector and the SoS. Subsequently, it is not considered that the site allocation document is legally compliant or sound on this matter as it is contradictory to the important conclusions drawn upon under appeal decision ref: APP/A5840/W/19/3225548 and the changes proposed by the government to the emerging London Plan as well as the wider planning policy aspirations of Southwark.

Changes to the Use Classes Order

The site allocations document does not reflect the recent introduction of The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020. The new legislation suggests that Parts A, B1 & D of the Use Class Order will be revoked and replaced with the new Class E.

It must be noted that, as of 1st September 2020, Class E was formally introduced. As the majority of the building’s on site were operating under the former Class B1 C use (now Class E), planning permission would not be required for flexible changes of use within the site, meaning, the quantum and nature /type of floorspace is not subject to planning control.

Subsequently, it is not considered that the site allocation document is legally compliant or sound on this matter as it does not comply with the changes or the opportunities associated with amendments to The Town and Country Planning (Use Classes) Order.

1) For the reasons set out above, reference planning application 17/AP/4797 and subsequent appeal decision ref: APP/A5840/W/19/3225548 within the wording of the site allocation;

2) For the reasons set out above, remove the requirement for individual proposals within the site to increase or provide at least the amount of employment floorspace currently on the site; and

<p>3) For the reasons set out above, update the uses listed within the site allocation to reflect the introduction of The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.</p>	
<p><b>Arjun Singh, HTA Planning ....on behalf of JH Parkhouse Ltd NSPPSV489</b></p> <p>Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? - legally compliant NO</p> <p>Do you consider this policy is sound? - sound NO</p> <p>Do you consider this policy is sound? - why not sound - Justified JUSTIFIED</p> <p>Do you consider this policy is sound? - why not sound - Effective EFFECTIVE</p> <p>Do you consider this policy is sound? - why not sound - Positively Prepared POSITIVELY PREPARED</p> <p>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 Comments have been submitted by HTA Design LLP, on behalf of JH Parkhouse Ltd, to the Council's Planning Policy team via email.</p> <p>The comments made in the response are also set out below to ensure they can be properly recorded by the Council.</p> <p>Joseph Homes fully support the Council's ambition to deliver a new and vibrant mixed-use neighbourhood in this part of the Borough and believe that planning to provide employment space for a diverse and balanced range of occupiers can help the Council achieve this ambition. Joseph Homes also supports the ambitions to enhance permeability, including creating a north-south green link, and public realm improvements which extend to greater planting along Parkhouse Street.</p> <p>The current version of this draft policy now includes an indicative residential capacity of 681 homes across the four sites within the wider business park which comprise the NSP22 allocation (21-23 Parkhouse Street, 25-33 Parkhouse Street, 35-39 Parkhouse Street and the Land at Burgess Business</p>	<p>Noted</p> <p>The New Southwark Plan Housing and Affordable Workspace Viability Study Update July 2019 (SP109) builds on the 2015 and 2017 Viability Studies and undertakes further viability testing of a number of policies in the Plan including Policy P1(social rented and intermediate housing) and Policy P30 (affordable workspace). The Study confirms it takes into consideration the cost implications of associated with design standards set out in the emerging NSP and the adopted London Plan. It confirms that the viability analysis in this study provides a high level understanding of the viability of potential development sites in the context of the cumulative impact of the Council's emerging planning policies. It should be noted that some sites may require more detailed site and scheme specific viability analysis when they come forward through the development management process. In line with the requirements of the NPPF and NPPG, it will be up to applicants to demonstrate to the Council whether particular circumstances justify the need for a viability assessment at the application stage.</p> <p>Where due to viability reasons the policy requirements cannot be met, this will need to be demonstrated and negotiated with a viability appraisal submitted if the development is not following the housing fast track route.</p> <p>The Viability Background Paper (EIP20) also sets out S106 and CIL requirements from developments and provides details on where these have been secured in schemes.</p> <p>The draft Parkhouse Street LDS is not a planning document however it is a</p>



Park). The indicative residential capacity for the site at 25-33 Parkhouse Street is 128 homes, as set out within Table 3 of Annex 2 of the draft Plan. This reflects the number of homes proposed in planning application 20/AP/0858.

This indicative capacity for the NSP22 site allocation recognises the strong need for housing in this part of the Borough, and that such capacity can be delivered through careful co-location with the industrial uses which are to be re-provided in accordance with the policy. The indicative quantum of homes also provides a useful benchmark for the overall scale of development, including taller buildings, which the Council has identified as potentially appropriate and thus is seeking to achieve in this location.

Though the changes to this policy are welcomed, there remains an absence of up-to-date supporting viability information to support this policy. The most recent viability testing which the Council undertook was in 2017, which was the Housing Policy Viability Update Study, which built upon the original research undertaken in 2015. Neither the original 2015 Study or 2017 Update Study could have accounted for the economic and political uncertainty, and changes to the markets for housing and commercial/industrial uses, which has arisen since then.

Paragraph 123 of NPPF states that Councils are required to contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. In accordance with this requirement, we suggest wording is included within the NSP 23 allocation text to reinforce this overarching national principle to the following effect:

‘Redevelopment of the site must:

- Ensure every individual development proposal increases or provides at least the amount of employment floorspace (B class) currently on the site; and
- Provide new homes (C3) of a mix, density and quality that are appropriate to ensure the optimization of the site within its surrounding context; and

useful expression of how the area could develop. The site allocation sets out the main principles of development which is intended to be adopted into the development plan. The Council is working proactively with all adjoining landowners with applications within the site allocation as well as consultation with the local community.



- Enhance permeability including new north-south and east-west green links; and
- Provide public realm improvements including a square’.

JH Parkhouse Ltd also strongly supports the Council’s approach to tall buildings within the site allocation, and the suggestion of considering each case on its own merit within the wider townscape and heritage context. This echoes the sentiment of paragraph 123 within the NPPF which advises that Council’s should refuse applications that do not make efficient use of the land. In order to ensure consistency, reference should also be made to the emerging Parkhouse Street Local Development Study (latest draft published October 2020), which identifies an opportunity within the site allocation for taller landmark buildings adjacent to the key pedestrian link into the Park and fronting the Park.

In summary, JH Parkhouse Ltd supports the aspiration to deliver mixed-use development in the Borough however we consider the policy should be further strengthened in order to optimise this brownfield site. To support this aspiration, we suggest that further viability testing should be undertaken to ensure that the Council has a robust evidence base which sufficiently reflects the proposed policy requirements, indicative housing capacity and the vision for the design of these schemes, to ensure that the aspiration is deliverable.