

Representation	Officer Response
MISC	
<p data-bbox="188 357 365 421">Derek Kinrade NSPPSV47.11</p> <p data-bbox="188 464 1021 496">As a general comment, isn't the new material somewhat pretentious?</p>	<p data-bbox="1140 464 1196 496">N/A.</p>
<p data-bbox="188 541 365 604">Derek Kinrade NSPPSV47.16</p> <p data-bbox="188 647 1106 855">The revised plan asserts that the Council will ensure that stakeholders will be involved in local planning decisions in accordance with the Statement of Community Involvement. They can help to shape regeneration and planning strategies. Throughout it commits to working with local people to achieve a series of targets, not least in three specific action areas and in conservation areas.</p> <p data-bbox="188 898 1106 1431">My submission is that present procedures fail to ensure that this commitment is met in the formulation of targets set out in section 10 of the plan, relating to site allocations. The Council encourages pre-application discussions with applicants, an advice service to assist them in shaping applications so as to conform with Southwark policies. Such discussions can be substantial, and their outcomes appear to underpin the objectives set out in the NSP. But in this period local people have no such direct involvement. They may volunteer informal comments, but these, I am told, carry no weight. In framing the NSP the Council relies only on the strength of the consultations undertaken by the aspiring applicant, who can be expected to contend that it has consulted widely and vigorously, and has taken account of public opinion. I submit, however, that this may not be a reliable indicator of the views of the local community. At the very least, the NSP put out for consultation should indicate that the plans are preliminary concepts, open to representations. Even better if local people could be consulted while the NSP</p>	<p data-bbox="1140 647 2065 927">A new Statement of Community Involvement is being prepared which sets out that the consultation required by the council through the planning application and plan-making process. A development consultation charter has also been introduced which sets out the minimum consultation requirements developments have to undertake. This also requires developers to submit an engagement summary setting out clearly engagement they have undertaken and setting out local concerns and how they have addressed them and how the feedback has shaped the development.</p> <p data-bbox="1140 970 2065 1074">The public also have the opportunity to provide their comments on proposed development when it is submitted which is considered by the council before determination of the application.</p>

is being written.

Local people come into the planning department's purview only in being allowed to comment after the planning application has been validated, already made to conform to the Council's rules. By then the shape of the project has already appeared in the NSP as though ex cathedra settled policy, and objectors are thus at a serious disadvantage. I take as an example the proposal to redevelop Peckham's Aylesham Centre. This has been the subject of protracted pre-application discussions with Council officers over several years, and the developer has consulted widely. There has been a significant response. Local people are keen for the site to be redeveloped to provide much needed shopping opportunities and housing, but what has emerged in the NSP is highly controversial, bound to be met by a tsunami of strenuous and thoughtful objections. I contend that what is set out as the Council's target:

- is out of keeping with the character of the town centre conservation area
- proposes more than double the number of dwellings envisaged in the Peckham & Nunhead Area Action Plan
- is unacceptably dense
- is not (to my mind) of exemplary design
- sits uneasily in Rye Lane with the adjacent historic clock tower and the buildings on the west side
- is an anomaly in respect of building heights (P16), and
- fails to respond to the needs of the majority of people who live and work in Peckham.

Yet it appears in the proposed NSP as part of the Council's plan for an improved Peckham. I do hope that this major planning development will not be decided before the NSP is settled.

Team London Bridge
NSPPSV179.1

Team London Bridge (TLB) is the Business Improvement District (BID) representing approximately 400 businesses in the area between London

Noted.

Bridge to the west, Tower Bridge to the east, and south towards Bermondsey. TLB has a strong remit from businesses since 2015 to deliver the London Bridge Plan. Our mission is to ensure London Bridge excels as a leading place for global commerce and continues to develop as a pioneering local centre for enterprise, culture and entertainment. Team London Bridge has been closely involved in the development of the New Southwark Plan, including through formal representations on earlier drafts of the Area Visions and policies. We have also contributed to the evidence base. We have reviewed the proposed changes to the submitted plan and have the following comments:

Helen JPS
NSPPSV422.1

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

Noted. Policy P52 seeks to ensure our streets support easy and safe cycling through the delivery of the Southwark Spine cycle route and our wider cycling route network.

<p>margins that will take years. As a life-long Southwark cyclist, it would be good to see a change before I die or give up cycling altogether. In so far as I can read it, this plan does not give me much hope. I hope you will be able to include this response in your report to inspectors.</p>	
<p>Natural England NSPPSV244.1</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England have no comments to make on this consultation.</p>	<p>Noted.</p>
<p>Highways England NSPPSV82.1</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals and policies that have the potential to impact the safe and efficient operation of the SRN, in particular the M25.</p> <p>We have reviewed the Proposed Changes to the New Southwark Plan documents and are satisfied that the changes will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT Circular 02/2013, particularly paragraphs 9 & 10, and MHCLG NPPF2019, particularly paragraphs 108 and 109). We have no comments or objections.</p>	<p>Noted.</p>

Adam Barnett
NSPPSV423.1

I'm certainly not opposed to flats being built on Blackpool Road, especially if a large proportion of them are affordable homes. However, I think for this to be an attractive prospect considerable thought must be given to improving the functioning of neighbourhood as a residential area. This is primarily regarding the amount of traffic, which has increased considerably since Covid and the closure of Rye Lane. It's quite a maze of rat runs with constant and fast moving traffic, with no traffic calming measures, poorly maintained pavements, no cycling infrastructure etc. I certainly don't have the answers to this but some sort of plan should be put in place to manage this and make the block more suitable for this much larger emphasis on residential buildings over businesses.

Noted.

Any development coming forward will be assessed against the relevant policies of the plan and will be subject of public consultation.

Guys and St Thomas' NHS Foundation Trust
NSPPSV76.1

Guy's and St Thomas' NHS Foundation Trust ("GSTT" or "the Trust") is pleased to respond to the latest proposed modifications of the New Southwark Plan ("New Southwark Plan Proposed Modifications"), which was submitted for examination in January 2020. All comments are made in the context of tests of soundness, as set out in Paragraph 35 of the National Planning Policy Framework (NPPF).

The Trust is responsible for providing a variety of healthcare facilities within the London Borough of Southwark including, of course, Guy's Hospital, one of London's best known teaching hospitals. The Trust is part of the NHS South East London Cluster area and has positive strategic and operational relationships with local Clinical Commissioning Groups (CCGs) in Southwark. The Trust works closely with Guy's & St Thomas' Charity (the Charity) and King's College London (KCL), and is part of King's Health Partners, an academic health science centre that brings together three of the leading NHS Foundation Trusts, world leading University for health and research education King's College London and other services across central and outer

Noted.

<p>London locations. As a pioneer in health research providing high quality teaching and education, the Trust employs over 18,000 staff and attracts around 12,000 visitors per day to Guy’s Hospital alone. The Trust is a major employer and healthcare provider for the Southwark community</p>	
<p>South East London Clinical Commissioning Group NSPPSV453.1</p> <p>NEW SOUTHWARK PLAN SUBMISSION VERSION PROPOSED MODIFICATIONS FOR EXAMINATION 2019 to 2034</p> <p>This response is from the South East London Clinical Commissioning Group (CCG) which covers the borough of Southwark. The CCG is pleased to respond to the latest proposed modifications of the New Southwark Plan (“New Southwark Plan Proposed Modifications”), which was submitted for examination in January 2020. All comments are made in the context of tests of soundness, as set out in Paragraph 35 of the National Planning Policy Framework (NPPF).</p> <p>The CCG is responsible for the commissioning of healthcare across its geographical area and is therefore particularly concerned with the built estate available from which such services are able to be provided. The estate may be sponsored directly by the CCG or required by a range of care providers including the local NHS trusts -Guy’s and St Thomas’ NHS Foundation Trust (GSTT), Kings’ College Hospital NHS Foundation Trust (KCH), South London and Maudsley NHS Foundation Trust (SLaM) – and a number of primary care and support service providers. We have worked with the NHS Healthy Urban Development Unit (HUDU) in considering the proposed changes to the New Southwark Plan and they are submitting a separate and wider response. We also support the comments in the representation from Guys and St Thomas’ NHS Foundation Trust.</p>	<p>Noted.</p>

<p>South East London Clinical Commissioning Group NSPPSV453.8</p> <p>Bakerloo Line Extension/ Old Ken Road - there needs to be an allocation here to create a Community Health Hub to serve both the existing and the proposed significantly expanded population. The space required for a community health hub is 4000 sqm.</p> <p>Several the site allocations include 'may include a community health hub' and it would be helpful if this were to include NHS facilities more generally. Where a hub is not required in a specific location, the development will nevertheless contribute to a demand for increased health facilities and we would need the developer to provide a contribution to expand or provide facilities elsewhere to mitigate the development and meet the needs of the new population.</p>	<p>A number of the Old Kent Road site allocations reference that development in the opportunity area will need to demonstrate that the site responds positively to the objectives of the AAP and provides the appropriate facilities for health care, education and leisure facilities.</p> <p>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 health facilities.</p>
<p>South East London Clinical Commissioning Group NSPPSV453.9</p> <p>The CCG is generally supportive of the New Southwark Plan Proposed Modifications and welcomes working collaboratively with the Council on any of the points raised in this response. It is requested that the above changes and principles are taken into account before any future adoption of the Draft Plan as part of the Examination process. As well as GSTT, the CCG would like to reserve the right to appear at Examination, if any further hearing sessions are held, on any of the points raised in this letter.</p>	<p>Noted.</p>
<p>Irene Payne Member of Southwark Pensioner's Action Group and Resident of North Walworth NSPPSV454.1</p> <p>Local area comments</p>	<p>Policy P67 (reducing flood risk) sets out requirements regarding flood risk for development proposals. In addition, where they meet the criteria, a Flood</p>

<p>The plan mentions areas at risk of flooding – New Kent Road is regularly very flooded from drains near the Rodney Road bus stop. Please can the plan address this?</p> <p>The Lendlease developments near me seem to continue to have high levels of unoccupied flats and houses. How will the plan ensure that this does not happen in the next phases of regeneration. This is unacceptable given the level of housing need in Southwark.</p> <p>Some residents from Lendlease car free developments manage to obtain Council parking permits and this increased the amount of parking in nearby residential streets. How will the plan deliver real car free residential areas?</p>	<p>Risk Assessment will need to accompany the planning application.</p> <p>This is not in the council’s control.</p> <p>Policy P53 (car parking) sets out the maximum car parking standards within the development depending on the Public Transport Accessibility Level (PTAL). Developments in PTAL 6a, 6b and 5 areas are not permitted to provide car parking spaces.</p>
<p>DP9 on behalf of British Land NSPPSV158.1</p> <p>We write on behalf of BL CW Holdings Ltd, a subsidiary of British Land Company Plc (British Land), to submit representations to the proposed changes to the submitted New Southwark Plan. As you are aware, British Land hold substantial land interests in Southwark, most significantly at Canada Water and obtained planning permission for the Canada Water Masterplan on 29th May 2020 (ref. 18/AP/1604). It is within this context that we welcome the opportunity to make representations to the submitted New Southwark Plan and this letter sets out our response to specific topics as below.</p>	<p>Noted.</p>
<p>Avison Young on behalf of London Hotel Group NSPPSV417.1</p> <p>We write on behalf of our client, LHG (London Hotel Group), regarding the ‘Proposed Changes to the Submission Version’ (August 2020) consultation being undertaken by London Borough of Southwark (LBS) in the preparation of a Draft Local Plan. LHG own several hotels across London, including one within Southwark (at 110 Peckham Road, SE15 5EU).</p>	<p>Noted.</p>

<p>We have previously made representations to the then Policy P36 of the 'Proposed Submission Version: Amended Policies' (January 2019) in correspondence dated 12th April 2019.</p> <p>We note the Inspectors Direction that representations should only comment where;</p> <p>(i) from anyone who was unable to comment on the APV content and now wishes to do so; and</p> <p>(ii) anyone who now wishes to comment on the latest proposed changes and the latest evidence base</p>	
<p>Avison Young on behalf of London Hotel Group NSPPSV417.4</p> <p>On the above basis, we consider that there are strong grounds to conclude that ancillary and publicly accessible facilities should be encouraged but not required in the New Southwark Plan. We consider that the current wording is overly prescriptive, is not found in any justified evidence and fails the tests of soundness set out in the NPPF. Therefore, it is quite appropriate for the Council to revert to its original wording of Policy P36 as set out in the Proposed Submission Version (December 2017).</p> <p>Overall, we trust our representation will be taken into account in the preparation of the New Southwark Plan and we would be grateful for confirmation of receipt of this letter. In the meantime please let me know if you have any queries</p>	<p>Noted.</p>
<p>John Bussy NSPPSV373.1</p> <p>I have filled in the questionnaire in Southwark's Consultation Hub but after Section 9 it would not allow me to proceed or submit my comments. I have sought guidance from planningpolicy@southwark but am emailing this in case I am unable to complete the questionnaire. I do not know what further</p>	<p>Noted, this was addressed and consultation was extended.</p>

<p>questions there might be after Section 9 but I would be grateful to be invited to the Examination in Public.</p>	
<p>John Bussy NSPPSV373.14</p> <p>Submitting comments to the NSP is an incredibly complex process. As far as I know I have only succeeded in encouraging one other local resident to undertake the task; it is far too daunting. I wanted to include comments on “P68: Sustainability” but the questionnaire gave me no option to do that. What I wanted to say is included in this pdf under policy P68 above.</p>	<p>Noted.</p>
<p>Janine Rowe NSPPSV92.1</p> <p>- I note that the Council is relying on a yet to be adopted SCI which won't be finalised until after this consultation closes. - I note that due to the extraordinary circumstances we are living under, with Covid restrictions, it is not realistic to expect a full and fair process of consultation on the Amended NSP to take place.</p>	<p>Noted.</p>
<p>Steve Lancashire NSPPSV172.1</p> <p>Introduction Once again I find myself in the unenviable position of making a submission on this matter. Previously wrote in April 2017 and May 2019 and will not repeat points made in these submissions as I've been assured the points made will be considered. However, I must say that the latest revised submission, which the Council officers – and members - decided they did not need to consult on, has many changes but none of great substance acknowledging and responding to comments previously made. I think the Inspector was quite</p>	<p>A new Statement of Community Involvement is being prepared which sets out that the consultation required by the council through the planning application and plan-making process. A development consultation charter has also been introduced which sets out the minimum consultation requirements developments have to undertake. This also requires developers to submit an engagement summary setting out clearly engagement they have undertaken and setting out local concerns and how they have addressed</p>

right to challenge the Council on the legality of the document and am astonished that the Council decided to just consult on the amendments they had made – and not consulted on. As we are all aware we are in the middle of a pandemic and thus consultation activities have been very limited. Eight weeks is really a completely inadequate period of time for this important consultation. I have seen no advertising or awareness raising by the Council apart from some reference buried in what they acknowledged is a poorly designed website. Over my many years of involvement – as a local government officer, councillor, voluntary organisation youth and community worker and local resident in this borough I have seen very little evidence that planning officers have a clue how to carry out effective consultation and see this vital activity as a tick box exercise. These Plan documents with their many revisions are very challenging and complex documents and I can see no evidence that efforts have been made to make them accessible to local residents whose lives they will profoundly affect.

Thus I would say in conclusion to this introduction that there is not a Statement of Community Involvement, which is still being drawn up, in spite of efforts made by some of us to help the Council create one. There for the plan is not compliant with the Section 10A (b) on the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012.

Generally I would argue that the Plan is unsound in all the areas I list below because either there is no substantial evidence cited to support the proposals and/or the specific proposals are not strong enough to prevent planning applications driving a cart horse through the holes created by their vagueness. Thus, it has not displayed it is justified, effective or achievable and also that it is in line with national and London policy. I sincerely hope to be given the opportunity to outline directly to the Inspector at the Examination in Public specific evidence to support the general points made in this and previous submissions.

them and how the feedback has shaped the development.

Steve Lancashire
NSPPSV172.12

I also have a great deal more to say about Area Visions and Site Allocations and also the lack of general references to older people and lacks specific policy commitments in spite of the Council's commitment to make Southwark an age friendly borough. The plan is silent on actual examples or commitments.

The Plan is in danger of being out of date before it is finalised. For example the impact of Covid-19 on the following needs to be assessed:

- 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 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. As I said at the outset, I hope I will have the opportunity to expand and support the various points made above and in previous submissions.

William Pearce
NSPPSV460.1

The Southwark Housing Strategy to 2043 (and is being updated) aims to meet the needs of the older people through a number of ways, including working with partners including health, housing and voluntary organisations to provide quality and affordable age friendly housing across the borough, and to deliver sustainable solutions to address specialist housing needs. We are committed to finding solutions to deliver and adapt properties to enable older residents to live independently as long as possible in their communities. As such, the NSP does not include a fixed target for specialist housing but the policy is clear that provision will be accepted where there is a demonstrated need.

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

I do not consider the New Southwark Plan to be sound. Whilst I welcome the prospect of having the run-down or derelict commercial areas back in use and potentially contributing to the local economy, I am becoming increasingly vexed by the attitude of developers involved in local projects.

What we are seeing, time and again is an 'air-grab' (as opposed to a land-grab) where profiteering from high-rise blocks is masquerading as regenerating local industry.

A cynical, insulting ploy to connect a modern, glass construction to an historical site of a botanical garden (that didn't have greenhouses). The employment opportunities that this, and other developments in the vicinity promote are unlikely to be 'new' jobs, given the current economic situation; rather they represent the relocation of existing jobs. Also, the residential properties are priced well beyond the pockets of the existing ground dwellers and are intended for the foreign investment market, therefore likely to remain empty. As if London needs more empty luxury apartments. I do not relish the idea of living in, or up against, someone's property portfolio.

William Pearce
NSPPSV460.3

In my view, to make the NSP sound, Southwark Council should be actively seeking AND PAYING ATTENTION TO, the aspirations of the existing local communities by involving local groups in the decision-making process. It should not be simply accepting the validity of Planning applications that have been designed to meet minimum legal obligations.

A new Statement of Community Involvement is being prepared which sets out that the consultation required by the council through the planning application and plan-making process. A development consultation charter has also been introduced which sets out the minimum consultation requirements developments have to undertake. This also requires developers to submit an engagement summary setting out clearly engagement they have undertaken and setting out local concerns and how they have addressed them and how the feedback has shaped the development.

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Jo Frost Pages Walk Residents Association
NSPPSV461.1

I am writing to you in reference to the New Southwark Plan Consultancy. I am the founder member of the Pages Walk Conservation Residents Association and have an extensive network of members with varying degrees of involvement in petitioning, objecting and negotiating what is best for existing residents and the future of our local area.

Noted.

Jo Frost Pages Walk Residents Association
NSPPSV461.2

We are extremely concerned with the scale of redevelopment and regeneration that is planned for our area. This plan was previously supported and would have been enabled by the Bakerloo Line extension which has now been put on hold by TFL London due to financial problems caused by the pandemic. We have to point out that the ambitious aim to double the population of Southwark over the next 10 years must either be re-thought or completely abandoned as it will no longer be supported by the infrastructure in terms of transport to support such a huge increase in population. In addition there has been widespread reduction of road capacity to increase cycle lanes and widen pavements for social distancing across the borough since the pandemic started. This has resulted in gridlocked traffic and is causing stress and misery for residents; journey times are hugely increased and as cars are now on the roads for longer which increasing fuel emissions. There have also been a huge increase in road rage resulting in altercations on the streets which I have witnessed on numerous occasions; this will only result in more violence on our streets. It's insane to keep reducing road capacity for traffic whilst simultaneously increasing the population. Whilst we can appreciate that the new developments are largely car-free, traffic will still be an issue as those without cars will still be using Ubers and Addison Lee, especially considering that the Bakerloo Line extension has been abandoned. The use of heavy goods vehicles for construction will also cause traffic problems.

Noted. 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.

We note your concern regarding hours of construction.

Additionally it appears that Southwark Council have little to no regard for the well being of existing residents during this challenging time of Covid-19. It was brought to my attention this week that Southwark Planning have increased permitted working hours on the London Square site off Crimscott Street to: Monday – Friday 07:00hrs to 19:00hrs, Saturday 08:00hrs to 19:00hrs, Sunday NO WORKING. With so many restrictions in place due to the pandemic many people are working from home and rarely going out, the noise from construction is having a huge impact on the mental health of existing residents which has already been compromised due to anxiety caused by the virus and lack of human face to face interaction.

Vision Development
NSPPSV462.1

Consultation response in relation to the New Southwark Plan 2018-2033 (Proposed Amendments to the Submitted New Southwark Plan)
We write to you on behalf of Vision Develop Ltd, to make representations in respect of the proposed amendments to the Submitted Version of the New Southwark Plan. Vision Develop has an interest in land at 5-7 Cottage Green, SE5 7ST and 69 Southampton Way, SE15. This land falls within the wider Draft Site Allocation NSP22: Burgess Business Park.

Vision Develop support the wider objectives of the Draft New Southwark Plan, which includes the objective of delivering 1,770 new homes within Camberwell, as outlined within draft Policy SP1b. They also support the principle of draft Site Allocation NSP22 as it seeks to promote mixeduse redevelopment of the Burgess Business Park.

Noted.

Diana Deacon Pages Walk Conservation Residents Association
NSPPSV463.3

I am writing to you in reference to the New Southwark Plan Consultancy. I am a member of the Pages Walk Conservation Residents Association and local resident. We are extremely concerned with the scale of redevelopment and regeneration that is planned for our area. This plan was previously supported and would have been enabled by the Bakerloo Line extension which has now been put on hold by TFL London due to financial problems caused by the pandemic. We have to point out that the ambitious aim to double the population of Southwark over the next 10 years must either be re-thought or completely abandoned as it will no longer be supported by the infrastructure in terms of transport to support such a huge increase in population. In addition there has been widespread reduction of road capacity to increase cycle lanes and widen pavements for social distancing across the borough since the pandemic started. This has resulted in gridlocked traffic and is causing stress and misery for residents; journey times are hugely increased and as cars are now on the roads for longer which increasing fuel emissions. There have also been a huge increase in road rage resulting in altercations on the streets. It's insane to keep reducing road capacity for traffic whilst simultaneously increasing the population. Whilst we can appreciate that the new developments are largely car-free, traffic will still be an issue as those without cars will still be using Ubers and Addison Lee, especially considering that the Bakerloo Line extension has been abandoned. The use of heavy goods vehicles for construction will also cause traffic problems.

Noted. 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.

QUOD on behalf of SGN
NSPPSV160.1

Proposed Changes to the Submitted New Southwark Plan – August 2020
Representations on behalf of Scotia Gas Network
Quod is instructed by our client Scotia Gas Network (SGN) to submit

Noted.

representations to Southwark Council's Proposed Changes to the Submitted New Southwark Plan and supporting evidence. In particular, the focus of our representation is in respect of Document EIP82 – Southwark Site Allocations Methodology Paper (updated July 2020) and are considered in accordance with the site allocation at Rotherhithe Gas Holder site, Salter Road, Southwark. We also provide comments with respect to Policy P14 Residential Design.

Background

The site contains the redundant Rotherhithe Gas Holder structure and is in a predominately residential location that benefits from good public transport connections (PTAL 4) and access to a range of local services and amenities. SGN has promoted the Rotherhithe Gas Holder site for inclusion as an allocated site through the New Southwark Plan. As set out in the previous representations submitted throughout the plan-making process; to bring forward the site, SGN are obliged to remediate the site. These remediation works, alongside dismantling of associated infrastructure and on site works to install a new high-pressure storage pipework will result in significant up-front costs, which in turn require higher value uses to fund this process.

QUOD on behalf of SGN NSPPSV160.4

Conclusion

Whilst the increase in indicative residential capacity reported in the updated Southwark Site Allocations Methodology Paper is welcomed, we believe that as currently drafted it's inclusion does not align with the Inspector's request, and would not be considered sound in accordance with the NPPF test of soundness.

The introduction of an indicative site capacity is also contrary to the Inspector's commentary and would place an unnecessary limitation of the development capacity of Site Allocation NSP75: Rotherhithe Gasometer and thus would not enable the site to meet its full development potential, contrary to the strategic guidance of the draft London Plan and national

Noted. A response is provided under the relevant policies.

<p>planning policy. The proposed amendment to Policy P14 Residential Design which requires children’s play space to be provided at ground or low level podium is not always practical nor a sound and approach and this text should be removed.</p>	
<p>Pegasus Group NSPPSV467.3</p> <p>Proposed Changes to the Submitted New Southwark Plan 2018-2033 (August 2020) Wevco Wharf, Sandgate Street, London SE15 1LE Representations on behalf of Bishopsgate Long Term Property Fund Unit We are instructed to submit representations to the New Southwark Plan (“NSP”), on behalf of our client, Bishopsgate Long Term Property Fund Unit, who are the freeholders of the Wevco Wharf site at Sandgate Street, London, SE15 1LE. The Wevco Wharf site is identified as ‘Site B’ on the plan enclosed at Annexe A. The following paragraphs set out our client’s observations on the proposed changes to the submitted NSP.. Background The NSP was submitted for Examination in Public on 16 January 2020. The current consultation (running from 27th August – 26th October 2020) relates to the Council’s proposed changes to the NSP following initial matters and concerns raised by the Planning Inspectors. Our client’s site falls within the proposed wider ‘Sandgate Street and Verney Road’ Site Allocation (ref. NSP65) in the submitted NSP, and remains as such within the latest ‘proposed changes’ version (August 2020) which is subject to this current consultation.</p>	<p>Noted.</p>
<p>South Marina Berth Holder’s Association (BHA) NSPPSV468.2</p>	

South Dock Marina Berth Holder's Association ('BHA') provides its response to the consultation on the submitted New Southwark Plan. We can confirm our wish to be heard at the Inspector's examination in public and if a statement of common ground will assist the examination please inform us at the earliest opportunity.

Background Facts

Berth Holder Licensing Contracts

1. South Dock Marina includes South Dock, Greenland Dock and South Dock Boatyard, all of which are owned and managed by the London Borough of Southwark ('LBS'). These marina docks offer berthing spaces to boat owners and facilities for maintenance and repair to any vessels in the London area capable of being lifted by our present crane system. In order to secure a space afloat, one needs to apply for a berthing licence of which there are currently two sorts: a 'Residential Licence', which permits the holder to use her boat as her primary residence and a 'Leisure Licence'.

2. Given the mismatch between available space and demand there is a long waiting list for residential licences. It is currently the role of LBS's marina manager to allocate places that become available. The extent of its public method or policy of allocation is found on the LBS website, which states: The marina operates separate waiting lists for residential and leisure berthing licences. Each list is sub divided by boat lengths to match berth sizes available in the marina.

The residential waiting list is extremely long and the opportunity for a licence is infrequent. We understand that most boats are sold with their residential licence for a "transfer fee of 10% value of the boat" payable to Southwark Council. The leisure waiting list is shorter but it can still take some time to get a berth with a leisure licence.

Berths are meant to be allocated, firstly taking into account the type of licence (residential / leisure) required and the commercial return. Secondly the length of the vessel is considered in relation to their fit within the physical berth available. The marina currently charges by length of vessel. Over the last 5 years, the proportion of larger vessels allocated residential

Noted.

licences has increased dramatically, changing the diversity of vessels and the economic means of berth holders.

3. The background section of the RL states that management is undertaken from the Marina Office by the Marina Manager. It is unclear whether this is intended to refer to management of allocation. SDMBHA are still awaiting clarification on contracts and licensing – in particular, for leisure licence holders who recently were subject to a 24% rise in fees (2019) at very short notice. There remain many inconsistencies in how the fees for these 'discretionary services' are set and applied

The Berth Holders Association (BHA)

4. The BHA was established in 1996 to 'protect & promote South Dock Marina and to maintain its status as publicly owned and publicly managed land for the benefit of local communities and visitors'. Its members are resident and leisure berth holders.

5. More recently, the BHA has set-up a Community Interest Company with the following aims, amongst others:

- a. Benefitting the Marina community;
- b. Developing ties with other local communities;
- c. Advising and supporting LBS on improvement, maintenance & renewal of the Marina to meet berth holder needs;
- d. Creating volunteering and apprenticeship opportunities.

6. Allocation of berths appears to be at the sole discretion and preference of a single harbour master. Further, we are told, berth-holders are unaware of the process by which berths are allocated and have no access to any published allocations policy.

7. There also appears to be a lack of transparency and consistency about the method of calculating licence and service charges. There has been dramatic inflation of both over the last ten years with an over 100% rise in mooring and boatyard fees and with little consideration to the cost of provision of this 'discretionary service' and no account taken of affordability.

8. Finally, the BHA is aware that there are a number of proposals to redevelop the Marina which may affect, remove or diminish vital facility provision for berth holders who have no other viable alternative which may

also significantly change the Marina’s historic role – providing affordable moorings, open water for sailing, and leisure activities for local communities - and vital boatyard. facilities enabling berth holders to service their boats to necessary health & safety standards.

Previous Assessments of need

9. The background section to the RL states that:

A number of issues emerged during 2006 and 2007, caused by a lack of clarity and consistency in the current berth-holder terms and conditions. This culminated in early 2007 in a decision to review the management and operations of the MARINA, which resulted in the launching of a process to review the then berth-holder terms and conditions of the MARINA. The aim was to provide greater clarity in the respective responsibilities of all parties, and to improve the overall management and operation of the MARINA.

The present document is the result of a joint consultative process between the MARINA’s management, the representatives of the South Dock Marina Berth Holders’ Association (“the SDMBHA” as defined), other berth holders and local residents. It is aimed at enabling both the COUNCIL and berth-holders to fulfil their various responsibilities in a fair and equitable way with consultation where necessary. [Emphasis added]

10. This implies that there may have been consultation on whatever current process exists, though it appears to have taken place over a decade ago. SDMBHA have repeatedly challenged and contested the steep rises in licence fees and recent changes to the fees applied to leisure licences. The recent 24% rise in leisure mooring fees has not been explained, clarified or justified in any way in respect to changes to the license contracts or conditions.

South Marina Berth Holder’s Association (BHA)
NSPPSV468.3

Consultation Response
NPPF

11. The National Planning Policy Framework (‘NPPF’) must be taken into

The need of berth holders is currently being considered through the preparation of a Boat Dweller Assessment.

account when preparing local development plans (NPPF page 1). It requires that plans should be:

- a. 'shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees';
- b. 'sound'. This entails, inter alia, that a plan is 'positively prepared' i.e. 'seeks to meet the area's objectively assessed needs' and 'justified' i.e. based on 'proportionate evidence'.

Section 8 Housing Act 1985

12. Section 8 Housing Act 1985 (as amended by section 124 Housing and Planning Act 2016) states (emphasis added):

(1) Every local housing authority shall consider housing conditions in their district and the needs of the district with respect to the provision of further housing accommodation.

(2) For that purpose the authority shall review any information which has been brought to their notice, including in particular information brought to their notice as a result of the consideration of the housing conditions in their district under section 3 of the Housing Act 2004.

3)In the case of a local housing authority in England, the duty under subsection (1) includes a duty to consider the needs of people residing in or resorting to their district with respect to the provision of—

- (a) sites on which caravans can be stationed, or
- (b) places on inland waterways where houseboats can be moored.

(4)In subsection (3)—

“caravan” has the meaning given by section 29 of the Caravan Sites and Control of Development Act 1960; “houseboat” means a boat or similar structure designed or adapted for use as a place to live.

In Draft Guidance on the application of section 124, MHCLG states that:

- a. It 'strongly recommends engagement with the community throughout the process' (p6)
- b. In that vein: 'A community liaison group could be formed for this purpose, with the help of representatives or a steering group, which could also provide advice on other matters, including the conduct of the

assessment itself. They could also help interpret and comment on the results emerging from the assessment, the conduct of a specialist survey where undertaken, and generally help encourage greater trust and community buy-in for the overall process’.

c. What is more, it recommends that ‘the local housing authority or partnership conduct a specialist survey and / or qualitative research to obtain further more detailed information’.

d. Following assessment of need, the local authority will need ‘to begin considering how to meet the accommodation needs identified in the assessment’ (p7).

e. Finally, it will need to ‘disseminate the results of the accommodation needs assessment to all relevant people and departments within the local authority (including planning colleagues) and partner organisations (such as other social landlords), and begin the process of facilitating or providing the necessary provision’.

Unlawfulness

13. There is currently no account taken of the needs of berth holders or of the wider community in Southwark who live on houseboats in the proposed amendments to the New Southwark Plan. It is our view that this is unlawful on the following grounds:

a. First, residents clearly have a number of particular needs as follows:

i. To be consulted on proposed redevelopment of the Marina and its surroundings and to be advised as to whether it will remain available for use by residential berth holders and as a working boatyard in the coming years;

ii. to have a consistent, fair and affordable set of service and licence charges for use of the Marina;

iii. to have a consistent, fair and transparent policy of berth allocation.

b. Second, as noted above, the NPPF states that the NSP will be unsound unless account is taken of objectively assessed needs. Similarly, Section 8 of the 1985 Act requires LBS to assess the needs of those residing on houseboats in the borough. In failing to take account of the above needs, therefore, the New Southwark Plan is in breach of Section 8 Housing Act 1985.

<p>14. The NPPF requires that those needs are assessed objectively and that conclusions drawn about them are justified by ‘proportionate evidence’. That evidence should derive, at least in part, from ‘effective early engagement’ with communities. Similarly, the Guidance to Section 8 recommends that consultation is undertaken in part by means of a ‘specialist survey’ and that a ‘community liaison group’ is formed to comment on that survey and feed into the results of the consultation more generally. Results of the consultation should then be disseminated to relevant persons within the local authorities.</p> <p>15. We consider therefore that an effective remedy to the unlawfulness identified above would consist of:</p> <ol style="list-style-type: none"> a. The commissioning of a specialist survey of the needs of the Marina community (and other boat dwelling communities in Southwark such as Tower Bridge Moorings); b. A wider and in-depth consultation with SDMBHA as a community liaison group in relation to the needs identified above and others as they arise; c. Publication of the results of the consultation and survey as well as an assessment of the needs identified therein and how they are to be addressed; d. Development and publication of a fair and transparent system of berth allocation and licence/service charges. 	
<p>HGH on behalf of Onslow NSPPSV469.1</p> <p>Response to Southwark Council’s Proposed Changes to the Submitted New Southwark Plan, 2020 These representations have been submitted on behalf of Onslow Group Limited which has a development interest across the borough, including the Blackfriars area.</p>	<p>Noted.</p>
<p>HGH on behalf of Tribe Student Housing Limited (Tribe)</p>	

NSPPSV470.1

On behalf of Tribe Student Housing Limited ('Tribe'), we write to make representations in respect of the Proposed Changes to the Submitted New Southwark Plan ('NSP').

Tribe (and its subsidiaries) own the freehold of several sites within the borough, including two within the Old Kent Road Action Area, and are committed to continue building their relationship with Southwark Council. Tribe's representations on the emerging NSP focus principally on the following topics:

1. Draft Allocation NSP65: Sandgate Street and Verney Road; and
2. Draft Policy P5 (Student homes).

For the avoidance of doubt, Tribe did not make representations in relation to these matters during previous rounds of consultation on the NSP.

Noted. A response is provided under the relevant policies.

Avison Young on behalf of national Grid
NSPPSV123.1

New Southwark Plan – Main Modifications Consultation
August – October 2020

Representations on behalf of National Grid

National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is

Noted.

reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Response

We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning their networks.

Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets.

We would be grateful if you could add our details shown below to your consultation database, if they are not already included:

Avison Young on behalf of National Grid

NSPPSV123.2

Guidance on development near National Grid assets

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Noted.

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's 'Guidelines for Development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here:

<https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their 'Guidelines when working near National Grid Electricity Transmission assets', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any

crossing of the easement.
National Grid's 'Guidelines when working near National Grid Gas assets' can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets
How to contact National Grid
If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please contact:

- National Grid's Plant Protection team: plantprotection@nationalgrid.com

Cadent Plant Protection Team
Block 1
Brick Kiln Street
Hinckley
LE10 0NA
0800 688 588
or visit the website: <https://www.beforeyoudig.cadentgas.com/login.aspx>

TfL Commercial Development
NSPPSV182.1

Thank you for providing the opportunity to comment on the Proposed Changes to the Submitted New Southwark Plan.
Please note that our representations below are the views of the Transport for London Commercial Development (TfL CD) planning team in its capacity as a significant landowner in the borough only and are separate from any representations that may be made by TfL in its statutory planning role and / or as the strategic transport authority for London. Our colleagues in TfL Spatial Planning are providing a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.
TfL CD have engaged through the Local Plan preparation process and have submitted the following representations (these are attached with this letter for ease):

Noted.

- Preferred Options consultation (letter 1 December 2016)
 - Area Visions and Site Allocations consultation (letter 27 April 2017)
 - New and Amended Preferred Options Policies (letter 13 September 2017)
 - Informal consultation on preferred version (letter 27 November 2017)
 - Reg. 19 Proposed Submission Version consultation (letter 27 February 2018).
 - Proposed submission version: Amended Policies (January 2019)
- Some of the matters raised in these letters remain relevant to this Proposed Changes to the Submitted New Southwark Plan consultation as follows.

Kath Scott Pages Walk Conservation Residents Association
NSPPSV139.1

I should like to add to the body of comments regarding the development plan for the local area. The extensive questionnaire on the Southwark website is so onerous it is preferable to send an email with my comments against proposals.

I have read and agreed with all the points that Jo Frost, Founder Member Pages Walk Conservation Residents Association has forwarded. So I should like to reiterate these as they are my points too and better expressed!

Please read the text below but first a personal addition:
GREEN SPACE

Last week I received a letter from Friends of the Earth stating that we currently have just 8m2 of public green space in Southwark and that takes into account the leafier suburbs of Dulwich etc.

The recommendation in the UK is for at least 20sq m2 and The World Health Organisation's recommendation is for 0.5 hectare per person within 300m of their living - or 30m2 Source WHO 2016:
https://www.euro.who.int/__data/assets/pdf_file/0005/321971/Urban-green-spaces-and-health-review-evidence.pdf?ua=1

Policies within Cleaner, Greener, Safer recognise the importance of open spaces (Policy P56) and green infrastructure (Policy P58). Policy P58 requires the provision of publically accessible open space and green links in major developments. Site allocations also identify where open spaces are required.

If residents in Southwark already have less than a third of the recommended green space today, how can we possibly conceive of denser population with poorer facilities and services to offer.

I should like to express how important green space is, not just pertinent in these times, but something that we all need for a reasonable quality of life and wellbeing.

A screenshot of the Green space rating shows that North Southwark and Bermondsey is Category E - the most deprived of green space. The BAME community as ever, are the most deprived of green space.

Communities in this area will endure further compromise in the vision to build higher and denser. (Please refer to 52. Kath Scott for image & links in the Consultation response folder)

Friends of the Earth Source:<https://friendsoftheearth.uk/nature/englands-not-so-green-and-pleasant-land-millions-can-only-access-green-space-size-garden> Friends of the Earth

Source:<https://friendsoftheearth.uk/nature/access-green-space-england-are-you-missing-out>

TfL Spatial Planning
NSPPSV181.1

New Southwark Plan proposed changes – August 2020

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. The comments are made from TfL's role as a transport operator and highway authority in the area. They have also been included as part of the response sent by the Greater London Authority (GLA). A separate response has been prepared by TfL CD Planning (Property) to reflect TfL's interests as a landowner and potential developer.

Thank you for consulting Transport for London (TfL) on the proposed changes

Noted.

to the New Southwark Plan (NSP) put forward in August this year (2020). We have set out below comments on all the changes made to the submission version of the Local Plan. These should be read alongside TfL's response to the proposed submission version in 2017/2018 and GLA's response to amended policies in 2019 which included some TfL comments.

The Mayor first published his draft new London Plan for consultation on 1st December 2017. Following examination, the Panel's report, including recommendations, was issued to the Mayor on 8 October 2019 and the Intend to Publish version of the London Plan (ItPLP) was published on 17 December 2019. The Mayor received directions from the Secretary of State on 13 March 2020 in the Annex to his response. The ItPLP and its evidence base are now material considerations and have significant weight, except specifically where affected by the tracked changes set out in the Secretary of State's Annex.

Publication of the final version of the new London Plan is anticipated later in the year, at which point it will form part of Southwark's Development Plan and contain the most up-to-date policies. Given its advanced stage in the adoption process, we will have regard to it when assessing and responding to local planning policy consultations, including proposed modifications to the NSP.

Local Plan policies should be aligned with relevant ItPIP policy and TfL's aims as set out in the Mayor's Transport Strategy (MTS). In particular, it is important that local plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network. The NSP should be consistent with transport policies in the ItPLP, particularly on issues such as car and cycle parking which have both been updated to reflect the Mayor's Transport Strategy, the Environment Strategy and the Health Inequalities Strategy. Our comments on specific modifications and suggestions for amendments or wording improvements are detailed below. We look forward to working with the Council to finalise the Local Plan as it moves towards adoption.

Environment Agency
NSPPSV48.1

New Southwark Plan (NSP): Proposed Changes
Thank you for contacting the Environment Agency on the above. We support the changes to the proposals map and schedule to add four map layers for areas benefiting from flood defences and surface water flood risk.

Noted.

Sarah Davidson Pages Walk Conservation Residents Association
NSPPSV473.1

and I write in relation to the New Southwark Plan Consultancy. I am a member of the Pages Walk Conservation Residents Association and, as a local resident, I wish to register my objections as laid out below. Like others, I am extremely concerned with the scale of redevelopment and regeneration that is planned for our area. This plan was previously supported and would have been enabled by the Bakerloo Line extension which has now been put on hold by TFL London due to financial problems caused by the pandemic. We have to point out that the ambitious aim to double the population of Southwark over the next 10 years must either be re-thought or completely abandoned as it will no longer be supported by the infrastructure in terms of transport to support such a huge increase in population. In addition there has been widespread reduction of road capacity to increase cycle lanes and widen pavements for social distancing across the borough since the pandemic started. This has resulted in gridlocked traffic and is causing stress and misery for residents; journey times are hugely increased and as cars are now on the roads for longer, fuel emissions are increasing with significant negative impacts on the health of those who live in the area. Whilst I can appreciate that the new developments are largely car-free, traffic will still be an issue as those without cars will still be using the roads (eg in taxis and buses), especially considering that the Bakerloo Line extension has been abandoned. The use of heavy goods vehicles for construction will also cause traffic problems.

Noted. 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.

Whilst the above outlines my and others' general concerns regarding current building and regeneration issues; please see below re my specific comments on the New Southwark Plan. The Pages Walk Conservation Residents Association wish to get Pages Walk, Willow Walk and Mandela Way identified specifically to the inspectors as areas of high concern.

WYG on behalf of John Lyon's Charity
NSPPSV214.1

PROPOSED CHANGES TO THE SUBMITTED NEW SOUTHWARK PLAN (AUGUST 2020)

On behalf of our client, John Lyon's Charity, landowners of the 'Parliamentary Press' building located on Mandela Way off the Old Kent Road, we respectfully submit the following formal representations to the "Proposed Changes to the Submitted New Southwark Plan (NSP)".

John Lyon's Charity ("the Charity") supports the overall strategic vision of the NSP and the more specific "Area Vision" for the Old Kent Road (AV.13) which recognises the significant role that the Old Kent Road will play in delivering regeneration and change, including the creation of new homes and much needed affordable housing, the creation of new employment space, critical infrastructure and green spaces; while also recognising the role that existing employment space plays in the regeneration strategy.

This letter sets out areas of concern and identifies those policies as potentially unsound. It sets out a number of amendments that could be made to ensure the soundness of the NSP. For the avoidance of doubt, previous comments made by WYG on behalf of the Charity remain valid and should be read in conjunction with these representations.

In preparing these representations, consideration has been given to paragraph 35 of the National Planning Policy Framework (NPPF, 2019) namely, to assess whether the NSP submission is 'sound' insofar as it has been:

- Positively prepared – the Council has objectively assessed the need for jobs, homes, service etc;

Noted.

<ul style="list-style-type: none"> • Justified – based upon robust and credible evidence base; • Effective – the Plan is achievable; and • Consistent with national policy – accords with the NPPF, the London Plan and other relevant policies. 	
<p>WYG on behalf of John Lyon’s Charity NSPPSV214.8</p> <p>Conclusions Overall, the Charity is supportive of the aims and objectives of the NSP and would be keen to engage Council officers on these matters in due course. Please do not hesitate to contact me if you require further information.</p>	<p>Noted.</p>
<p>WSP on behalf of Apex Investment group Ltd NSPPSV474.1</p> <p>REPRESENTATIONS TO THE CONSULTATION ON THE PROPOSED CHANGES TO THE SUBMITTED NEW SOUTHWARK PLAN, APEX INVESTMENT GROUP LTD, OCTOBER 2020</p> <p>We write on behalf of our client, Apex Investment Group Ltd, in response to the current consultation on the Proposed Changes to the Submitted New Southwark Plan. Our client is the owner of the site at 310-330 St James’s Road, Southwark SE1 9JX, which is shown on the accompanying Site Location Plan.</p> <p>INTRODUCTION</p> <p>The site within our client’s ownership is identified for new residential-led mixed use development within the Draft New Southwark Plan, within the Old Kent Road Opportunity Area (“OA”) (Site ref. NSP64).</p> <p>This representation sets out our client’s aspirations to realise the potential for the site to contribute to the delivery of new housing and employment floorspace within the Old Kent Road OA, in addition to elivering a number of other key benefits for local residents, including affordable housing and amenity space provision and the creation of an enhanced public realm, which</p>	<p>Noted, the comments are responded to under the relevant policies.</p>

the site is capable of delivering.

Preparation of a planning application is currently underway for the development of the site to come forward within the next three years.

This letter of representation is structured as follows:

- ☑ Description of the existing site context;
- ☑ Review of Proposed Changes to the Submitted New Southwark Plan and its associated evidence base; and
- ☑ Summary of development benefits at 310-330 St James's Road.

DESCRIPTION OF THE EXISTING SITE CONTEXT

The site is located within the Old Kent Road OA, close to the junction of Old Kent Road and Rotherhithe New Road. The site is comprised of the single storey former warehousing of a wholesale meat and poultry business (310-326 St James's Road); to the south of this, a threestorey office building previously owned by Firetecncis Systems fronting St James's Road (328 St. James's Road); and a two-storey building formerly in use as offices and workshops to the rear of the site (330 St James's Road).

A 19-storey building at 399 Rotherhithe New Road lies to the south east of the site on the opposite side of Rotherhithe New Road. The Skyroom Chevron Ltd. apartment building at 293 - 304 St James's Road has been converted from offices to a three-storey residential scheme and a planning application is pending to extend the existing building by four storeys, to provide an additional 15 apartments over 7 storeys (Ref. 19/AP/6395). The disused petrol station at 272 St James's Road

James's Road to the north was granted consent at appeal in March 2020 for a new nine storey building to provide student accommodation (Ref. APP/A5840/W/19/3228534).

To the south of the site is the Cantium Retail Park which has planning permission for comprehensive development for residential, retail and employment uses (ref. 18/AP/3246). Other planning applications recently approved in the vicinity include: 1,152 dwellings and retail and commercial uses at the Ruby Triangle site over 48 storeys (Ref. 18/AP/0897); 338 dwellings and light industrial uses at 6-12 Verney Road within buildings of 18, 19 and 24 storeys (Ref. 17/AP/4508); and a 48-storey building for 724

dwellings to the west of the site at Southernwood Retail Park (Ref. 18/AP/3551). At the start of October 2020, application 19/AP/2307 was approved for 219 new homes across building heights ranging between 5 and 32 storeys at Daisy Business Park, 19-35 Sylvan Grove, to the south east of the site.

The site is well-connected to central London via South Bermondsey train station (approximately 800 metres from the site) and has a Transport for London PTAL rating of 3, categorised as ‘good’, and benefits from access to a range of public transport modes within walking distance. The site is located close to the proposed route of the Bakerloo Line Extension along Old Kent Road.

PROPOSED CHANGES TO THE SUBMITTED NEW SOUTHWARK PLAN

As a sustainable site within an identified regeneration area, our client supports the proposed allocation of the site in the New Southwark Plan.

Rolffe Judd on behalf of London School of Economics and Political Science (LES)
NSPPSV113.1

Representations by London School of Economics and Political Science
Proposed Changes to the Submitted New Southwark Plan 2020

We write on behalf of the London School of Economic and Political Science (LSE) in respect of the current consultation on the Proposed Changes to the Submitted New Southwark Plan between 27th August 2020 to 26th October 2020.

At various stages of the development of the New Southwark Plan, LSE has submitted representations to the Council regarding two principal concerns the School has on the policies of the Plan. These concerns relate to:

- ☑ The provision of Student Homes
- ☑ Borough Views (and Annex 1)

The relevant policies are Policy P5 Student Homes and Policy P21 Borough Views (including Annex 1), although policy numbers and references have altered as the Plan has evolved. Within the Proposed Changes to the

Noted, the comments are responded to under the relevant policies.

Submitted New Southwark Plan, the revised wording related to Borough Views are warmly welcomed as these incorporate many of the comments LSE has made over the past two years. LSE continues to recommend changes to this policy but welcomes the Council's suggested changes.

However LSE remains deeply concerned that the Council is applying an ever stricter policy approach to the provision of student homes in the borough which will, if adopted, have a devastating effect on the ability of higher education institutions such as LSE to provide student homes and affordable accommodation for students wishing to study in London. The wording of Policy P5 does not reflect the wording of Policy 3.8 of the London Plan 2016 or Policy H15 of the Draft London Plan (ITP) which seek affordable student housing but not conventional affordable housing with student housing schemes. Furthermore LSE has expressed concerns that the Council is not differentiating clearly enough the delivery of nominated student accommodation by Higher Education Institutions (HEI) with that of private 'direct let' providers, who charge significantly greater rents and which do not directly provide for students staying at a specific higher education institution. Previous Representations (NSPPSV113 & NSPPSV411)

LSE has made a series of representations on versions of the NSP and has met with officers and Councillors a number of times to outline the School's concerns over the impact of the policies on the delivery of student homes in the borough. We append a further copy of the representations for the Inspector's review. We summarise these representations below:

On 17th December 2018 Julian Robinson, Director of Estates of the LSE wrote to the Council (copy attached) setting out the concerns of LSE on two key policies of the Draft New Southwark Plan (NSP) as issued for Consultation in December 2017. The comments related to Policy P19 and Annex 4 (Borough Views) and Policy P24 Student Homes.

The representation included advice from Dr Chris Miele of Montagu Evans which noted that a lack of consistency between the wording of the policy and the wording within the Annex and the relative moderate status of the view in the hierarchy of townscape views in the Plan. Mr Robinson's letter also highlighted that Southwark Council's policies towards the provision of

student housing were not in conformity with the adopted and emerging London Plan policies.

Further to this representation discussions were held between LSE and the Council to discuss the concerns of LSE to these two key policies and the opportunities that would be available for LSE to make further representations on the NSP. In January 2019 the New Southwark Plan Proposed Submission Version: Amended Policies Version (APV) was submitted for consultation. Having viewed the Amended Policies Version none of the matters raised in the letter from Julian Robinson were addressed at this stage.

In May 2019 Pinsent Masons Solicitors acting on behalf of LSE submitted a further representation to the Council on the APV. Appended with this representation was a Technical Appendix to Representation made on behalf of LSE which was prepared by Montagu Evans. We enclose further copies of these representations.

The representation by Pinsent Mason noted that:

☐ Policy P19 and Annex 4 are in direct conflict with Strategic Polices in the London Plan and the London View Management Framework by seeking to designate 'Strategic View' status to borough views.

☐ Policy P19 and Annex 4 are in direct conflict with the Planning (Listed Buildings and Conservation Areas) Act 1990 and the National Planning Policy Framework by imposing tests for proposed development which are more restrictive than those set out in statute, national policy and the national regime for designation of listed buildings ☐ For the reasons above, adoption of Policy P19 and Annex 4 as currently drafted will set an unhelpful precedent for plan-making across other boroughs and districts ☐ Policy P24 is in direct conflict with emerging strategic policies in the draft London Plan relating to provision of affordable accommodation within purpose built student housing

Rolf Judd on behalf of London School of Economics and Political Science
(LES)
NSPPSV113.1

<p>PROPOSED CHANGES TO THE SUBMITTED NEW SOUTHWARK PLAN (JANUARY 2020 AND AUGUST 2020)</p> <p>LSE REPRESENTATION ON THE CHANGES SINCE THE APV</p> <p>In January 2020 the Council issued for submission to the Secretary of State the Submission Version of the NSP. Following concerns raised by the Inspectors in May and June 2020 over the process undertaken, the Council issued for re-consultation the Proposed Changes to the Submitted New Southwark Plan on 27th August 2020. The Proposed Changes to the Submitted New Southwark Plan is primarily identical to the Plan issued for Submission to the Secretary of State although a number of minor changes have been made.</p> <p>The comments below for Policy P5 and Policy P21 relate to changes made in the most recent version of the Plan.</p>	<p>Noted, the comments are responded to under the relevant policies.</p>
<p>Rolffe Judd on behalf of London School of Economics and Political Science (LSE) NSPPSV113.5</p> <p>LSE remain committed to Southwark and support the ambition of the New Southwark Plan to deliver positive change for those who live, work and study in the Borough. LSE is keen to continue the good working relationship it has with the Borough and are keen to maintain a dialogue with officers and members to work towards delivering these goals.</p>	<p>Noted, the comments are responded to under the relevant policies.</p>
<p>Savills on behalf of Safestore NSPPSV157.1</p> <p>Dear Sir/Madam, Proposed Changes to the Submitted New Southwark Plan Consultation Safestore Holdings PLC Representations We welcome the opportunity to comment on the London Borough of</p>	<p>Noted, the comments are responded to under the relevant policies.</p>

Southwark's ('LBS') New Southwark Plan ('NSP'), in line with the Town and Country Planning (Local Planning) (England) Regulations 2012. We write on behalf of Safestore Holdings PLC, hereinafter referred to as 'Safestore', and set out our observations to the amended New Southwark Plan, which was published for further consultation on the on 27th August.

Savills acts on behalf of a significant number of landowners and developers across London. We are fully supportive of the view that a positive policy framework can and should be used to improve our city's built environment and deliver the good growth in homes, jobs and infrastructure that Londoners require, a theme that is carried through both National and London-wide planning policies.

Previously, Savills have submitted representations on behalf of Safestore to the LBS with regard to the New Southwark Plan: Proposed Submission Version (December 2017) on February 27th 2018. We now make the following comments on behalf of Safestore, relating to the proposed policies within the NSP which are discussed in detail below. We look forward to engaging with you further in relation to the proposed NSP in the future.

Background

Safestore is the UK's largest and Europe's second largest self-storage provider. It has 126 stores in the UK, with 47 in London. It has been in operation since 1998 and offers personal and business storage space, providing an essential service to local businesses and residents.

Safestore operate two employment sites within the LBS:

- ☐ 737 Old Kent Road; and
- ☐ 24 Old Jamaica Road.

Safestore provides self-storage solutions to the public and businesses. Self-storage is an increasingly popular and important service which complements modern living and business needs. Nationally, just over half of Safestore's space is occupied by residential customers with the remainder occupied by businesses. Safestore have occupied 737 Old Kent Road since 1997 and the Old Jamaica Road site since 2001, with both sites serving many local residents and businesses within the borough. The businesses which use Safestore tend to be small and medium sized and

are attracted by the all-inclusive and flexible terms. These make the product an affordable and desirable option compared to traditional warehousing. Businesses can increase or decrease unit size at short notice without charge and can exit the facility with less than one month's notice.

To fully understand how Safestore sites support small and independent businesses, Savills Economics have undertaken a survey on how Safestore's business customers use their storage facilities, and the economic benefits associated with this. The results show that Safestore self-storage units perform an important function for micro and small-medium sized enterprises.

It is therefore apparent that many existing businesses within LBS rely on Safestore as a viable and cost effective place from which to operate and/or use for storage as an essential component of each business and their operations. Therefore, Savills make representations to LBS with good faith that the local business and residential population will benefit should these comments be taken into consideration.

Representation

This phase of consultation focuses on the proposed changes to the submitted NSP. The submitted NSP is split into three main areas: the Area Visions; Planning Policies and Site Allocations. This representation focuses on the planning policies of the draft NSP and their effectiveness.

As part of the examination, the independent Planning Inspector is required to consider whether the NSP has been positively prepared, is justified, effective, and is consistent with national policy. In this regard, although Savills are supportive of a number of policies contained within the draft NSP, there are a small number which are considered to be ineffective, or inconsistent with national policy as they are currently drafted.

This is because a number of the draft policies as they are currently worded would effectively act as a barrier for positive growth within the borough through the development of Use Class B8 storage and distribution facilities. The business model of a B8 storage facility site is to provide other enterprises and businesses with the floorspace and infrastructure they need to facilitate the growth of their businesses within a modern

economy. We consider that Use Class B8 self-storage floorspace and its unique and tangible benefits to local employment opportunities have been overlooked during the formulation of some of the draft NSP policies. Within the representation, underlined words have been introduced by the LBS as part of their latest proposed amendments to the NSP, and crossed out words have been removed by LBS. We have also made a number of suggested alterations to draft policy wording. Suggested deletions are shown in red, whilst suggested additions are shown in green. Lastly, we would also note at this point that the recently amended Use Class Order (September 2020) separates the previous Use Class B1a, B1b and B1c into the new Use Class E, making it distinct from the remaining Use Classes B2 and B8. These changes are referenced as part of our proposed amendments to various draft policies in the remainder of this letter where required, but we have not suggested the required unilateral changes to each draft policy of the NSP where they currently refer to the previous Use Class Order.

Savills on behalf of Safestore
NSPPSV157.11

Conclusion

Having reviewed the draft New Southwark Plan, Safestore are generally supportive of the document for its proactive approach to providing further guidance on what well-designed developments across London should look like.

However, it is of our view that the Plan in its current form is unsound, particularly in relation to the harmful impact that a number of its draft policies would have on the local economy and Use Class B8 development. Indeed there are a number of policies that have the potential to greatly restrain the provision of self-storage facilities within the borough, which should be further clarified or amended before adoption of the Plan.

Thank you for giving us the opportunity to comment on the draft New

Noted, the comments are responded to under the relevant policies.

<p>Southwark Plan. We trust that these comments will be taken into consideration and we would welcome further dialogue with Officers if they would like to discuss any of the comments raised above.</p>	
<p>Q Square on behalf of Regent Land and Development NSPPSV476.1</p> <p>Consultation response in relation to the New Southwark Plan 2018-2033 (Proposed Amendments to the Submitted New Southwark Plan) We write to you on behalf of Regent Land and Developments Ltd, to make representations in respect of the proposed amendments to the Submitted Version of the New Southwark Plan. Regent Land and Developments have an interest in several sites across the Borough. Regent Land and Developments support the wider objectives of the Draft New Southwark Plan, including the delivery of new homes and jobs through the optimisation of appropriate sites for redevelopment. Comments in relation to the Submitted Version of the New Southwark Plan are summarised below in Table 1. Each comment made has been assessed in the context of the test of 'soundness', whether the policies have been 'positively prepared', 'effective', 'justified' and 'consistent with national policy'.</p>	<p>Noted.</p>
<p>Q Square on behalf of Regent Land and Development NSPPSV476.6</p> <p>Based on the above, Regent Land and Developments consider that these policy amendments are necessary to ensure that the draft New Southwark Plan meetings the tests of 'soundness'. We seek confirmation of receipt of this representation and that it will be considered moving forward as part of the adoption process. Should you require any further clarification please feel free to contact me.</p>	<p>Noted.</p>

Montagu Evans LLP on behalf of WPP 2005Ltd
NSPPSV477.1

LONDON BOROUGH OF SOUTHWARK – FINANCIAL TIMES BUILDING, 1
SOUTHWARK BRIDGE, LONDON, SE1 9HL
REPRESENTATIONS TO THE NSP: SOUTHWARK COUNCIL’S PROPOSED
CHANGES TO THE SUBMITTED NEW SOUTHWARK PLAN 2020 ON BEHALF OF
WPP 2005 LTD

On behalf of our client, WPP 2005 Ltd, we have prepared these
representations to the London Borough of Southwark (“LBS”) in response to
the Proposed Changes to the Submitted New Southwark Plan 2018-2033
(August 2020). More specifically, this representation has been prepared in
relation to Financial Times Building, 1 Southwark Bridge, London, SE1 9HL
(the “Site”).

CONTEXT FOR REPRESENTATIONS

WPP are a long leasehold owner of 1 Southwark Bridge Road (also known as
the “Financial Times Building”), which forms part of draft New Southwark
Plan site allocation NSP05. On behalf of WPP, Montagu Evans have been
engaging in pre-application discussions with LBS to progress proposals to
refurbish, upgrade and extend the existing building with the intention of
submitting a planning application for this development by the end of 2020.
These representations are specifically concerned with the 1 Southwark
Bridge Road in the context of draft site allocation (NSP05: 1 Southwark
Bridge Road and Red Lion Court) and proposed draft Policy P30 (Affordable
Workspace).

THE SITE

The Site currently comprises a commercial building that was previously
occupied by the Financial Times. However, the Financial Time have vacated
the building and relocated to the City of London in 2019. The Site is currently
vacant. WPP acquired the building as part of their strategy to expand their
business campus on the Southbank. WPP currently occupy Sea Containers
House and have recently received planning permission for the
redevelopment of Rose Court, which sits immediately opposite the Site

Noted.

across Southwark Bridge Road. Between them, it is anticipated that these buildings will house approximately 6000 WPP employees as part of the WPP London Campus.

The existing FT building comprises a 6 storey building that provides approximately 18,643 sqm (gross internal area) of office floorspace. The building occupies a prominent location fronting onto the river Thames. The external fabric of the building, roof coverings and façade are nearing the end of their serviceable life and need replacement to bring them to current building regulation and environmental performance standards. Moreover, the interior layout is in need of updating to meet the expectation of occupiers and modern working practices and to ensure that it operates to a similar level to comparable buildings seen around Southwark and central London.

CURRENT SOUTHWARK LOCAL PLAN POLICY DESIGNATIONS

Within the current adopted Southwark Plan, the Site is subject to the following designations:

- Bankside and Borough District Town Centre;
- Bankside, Borough, London Bridge Strategic Cultural Area;
- The River Thames and tidal tributaries SINIC;
- Bankside, Borough and London Bridge Opportunity Area;
- Thames Policy Area;
- Central Activity Zone (“CAZ”); and
- Air Quality Management Area.

The Site lies within Flood Zone 3 (albeit benefits from flood defences).

The Building is not statutorily or locally listed, however, there are various listed buildings in the surrounding area. The Site is not located within a conservation area, however the Bear Street Conservation Area lies immediately to the south of the Site.

Montagu Evans LLP on behalf of WWP 2005 Ltd
NSPPSV477.4

CONCLUSIONS

Noted. These comments are addressed under the relevant site/policy.

In summary, we broadly support the draft Site Allocation NSP05, however this should be amended to support the option for refurbishment of existing building and to ensure a proportionate approach to the provision of the wider objectives of the allocation from this type of development.

In addition, draft Policy P30 as currently worded is not considered to be viable and would be contrary to Regulation 122 of The Community Infrastructure Levy Regulations 2010. The current draft Policy would act as a disincentive to small scale commercial developments and proposals seeking the refurbishment and upgrade of existing office stock. This draft Policy should be amended so that AWS provision should only be sought on major redevelopment proposals and should be on the basis of 10% of the proposed uplift in gross employment floorspace.

We trust these comments are useful at this stage. By way of this letter we reserve the right to comment on further rounds of consultation and attend the Examination in Public on behalf of our client.

Richard Lee
NSPPSV148.1

I wish to take part at the oral examination/ public hearings.
I do not consider the Local Plan is legally compliant or sound and set out the reasons below.

The Plan does not meet the legal requirements

There are 3 major concerns:

- What is being consulted on is unclear
- Which Statement of Community Involvement (SCI) is being used is unclear
- There is a failure to discharge the Public Sector Equality Duty and undertake a meaningful Equality Impact Assessment

What is being consulted on is unclear

It has proved confusing to have different versions of the NSP, with people not understanding what they can comment on. Under submission documents there is:

A clean New Southwark Plan (EIP27A) and a track changes New Southwark (EIP27B) have been provided to ensure changes can be clearly identified. In addition, a schedule of changes for the New Southwark (EIP27D) has been prepared to clearly set out what changes have been made since the Proposed Submission version and the reason for the change. The scope of the consultation has clearly been identified on our website and the consultation plan (EIP74).

Public Sector Equality Duty

Section 149 of the Equality Act 2010 provides that a public authority must have due regard to the need to:

1. eliminate discrimination, harassment, victimisation and any other prohibited conduct;

* NSP01 NEW SOUTHWARK PLAN SUBMISSION VERSION - PROPOSED MODIFICATIONS FOR EXAMINATION 2019 to 2034 JANUARY 2020

How does this differ to the following examination documents:

* EIP27A (clean version) and EIP27B (tracked version) NEW SOUTHWARK PLAN SOUTHWARK COUNCIL'S PROPOSED CHANGES TO THE SUBMITTED NEW SOUTHWARKPLAN 2018 to 2033 AUGUST 2020 (note the plan period is now 2018-33, when in the other document it is 2019-34).

If one works with the clean version EIP27A, then the invitation is surely to comment on what one sees in front of you i.e. the whole document. On the other hand, EIP27B shows a deleted submission policy, followed by the new policy with some parts underlined. If you commented before on the Amended policies then, presumably, you must work with EIP27B and it is the underlined parts only that the Inspectors wish you to comment upon now. But this is not very clear.

I have tried to limit my comments to where, as far as I can tell, there has been a modification since I last made a representation in May 2019, but I have to say I have found this to be very difficult.

It will also be difficult, for participants and Inspectors, to align 3 sets of representations – submission version, amended policies and proposed changes – and this seems a recipe for confusion. I fear the public will not be given a fair opportunity to make their case effectively.

It will also be difficult, for participants and Inspectors, to align 3 sets of representations – submission version, amended policies and proposed changes – and this seems a recipe for confusion. I fear the public will not be given a fair opportunity to make their case effectively.

This approach can be illustrated by looking at 2 policies where undoubtedly there are negative impacts on BAME groups. P11 Gypsies and Travellers, where there can be no doubt that following the national definition of who is a Traveller will have a negative impact on Travellers who have had to move to bricks and mortar homes, and the Elephant and Castle site allocation

2. advance equality of opportunity between persons who share a relevant protected characteristic and those who do not;
3. foster good relations between those who share a relevant protected characteristic and those who do not.

The Public Sector Equality Duty (PSED) is not a duty to achieve a particular result, but rather to have due regard to the need to achieve the statutory goals. This means that in formulating the NSP, we must conscientiously consider the need to eliminate discrimination; advance equality of opportunity and foster good relations. In order to do so, we should consider how our policies are likely to affect those with protected characteristics (as defined in section 4 of the Equality Act).

We have prepared an Equalities Impact Assessment (“EqIA”) to consider the potential impacts of its draft policies on different groups. The EqIA considers the impact of draft policy P11 on persons with relevant characteristics, and notes that the safeguarding of existing gypsy and traveller sites, subject to need, is expected to have a positive impact. It also recognises that the provision of policy criteria against which to assess potential new sites may have the effect of restricting the sites on which gypsy and travellers may be accommodated, which may result in some adverse effects, but considers that this is necessary in the interests of good planning.

The EqIA explains that the PPTS definition of gypsies and travellers does not include those who have ceased to travel permanently. Consistent with the PPTS, draft policy P11 does not seek to meet any wider need for pitches to meet the needs of settled gypsies and travellers, but the EqIA notes that the Council is committed to working to meet this wider need through other mechanisms outside of planning policy.

The EqIA demonstrates that we have considered the likely impact of draft policy P11 on gypsies and travellers. The EqIA is intended to be a ‘live’ document that is continually updated. We will consider further whether the

which has undoubtedly led to the loss of livelihood for a large number of BAME traders.

For P11 Gypsies and Travellers, exactly the same text is used for each of the 9 protected characteristics:

“Draft Policy P11 safeguards the borough’s four existing Gypsy and Traveller sites where there is an identified need for them, as well as making provision for the identification of new sites to meet any identified need for additional Gypsy and Traveller accommodation. The safeguarding of existing Gypsy and Travellers sites (subject to need) is expected to have a positive impact on this group. The provision of policy criteria against which to assess potential new sites provides a greater degree of certainty as to the types of sites which will be acceptable to the Council for Gypsy and Traveller accommodation, which is also beneficial. It is recognised that the criteria may serve to restrict the sites on which Gypsy and Traveller pitches may be accommodated, which may have some adverse effect. However, this is necessary in the interest of good planning and the Gypsy and Traveller Accommodation Assessment Report (May 2020) does not identify any need for additional Gypsy and Traveller pitches in Southwark.”

That is, this same text is repeated 9 times throughout the EqIA. There is no differentiation between the various protected characteristics, and no recognition of the negative impacts upon Travellers caused by the Council’s policy choice. Both are a clear failure to apply the PSED.

Elephant and Castle Site allocation is a major town centre in Southwark. The area vision sets out that improvement should be made to accessibility of walking, cycling and public transport routes. This illustrates positive impacts, regardless of age regarding mobility. Elephant and Castle is an attractive location for new specialised services and research that can have wider benefits for the local community by attracting growth and investment and improved infrastructure provisions for all. Elephant and Castle has enormous capacity for growth, this creates opportunities to foster good relations for all by creating spaces for housing and employment that are high quality. This includes cultural facilities and a community health hub, to improve access for all regardless.

decision to provide pitches to meet only those falling within the PPTS definition is likely to disproportionately affect particular groups of people with protected characteristics.

Any planning application for development at Elephant and Castle site allocations will require the submission of an Equalities Impact Assessment to understand the impact of development on people with protected characteristics and whether this is positive, negative or neutral and whether negative impact can be mitigated.

The EQIA will continually be reviewed.

For the Elephant and Castle site allocation, the text shows slight changes only and when it comes to the protected characteristic for Race, the assessment illustrates the positive impacts of providing opportunities for existing businesses, particularly it says for those from minority ethnic groups to relocate and continue trading.

The EqIA has been revised, with an Appendix 2: Covid-19 Statement on Equalities. This starts with a list of impacts arising from Covid-19 on particular policy areas and in paragraph 3 commits to continually reviewing and updating the EqIA. It says the impact of Covid-19 will be assessed in the SCI. Paragraph 5 lists nine policy areas where reviews are taking place. These reviews should be provided as evidence base documents (they are not) and main modifications to the NSP should emerge (but none yet).

Appendix 2 seems to exist as a separate document. There is nothing to suggest that the EqIA has looked at the different policies of the NSP through the lens of Covid-19 impacts on protected groups.

Southwark Law Centre
NSPPSV167.1

Consultation response

This is a representation in response to the consultation on the New Southwark Plan 2020 made on behalf of Southwark Law Centre. Southwark Law Centre has made other representations to the previous consultations and we request to be heard at the Examination in Public.

Southwark Law Centre which is a registered charity and company limited by guarantee was founded in 1976. The objectives may be summarised as the relief of poverty, suffering and distress through the provision of free, impartial and confidential specialist legal advice and representation. Our main focus is supporting disadvantaged people who live, study or work in the London Borough of Southwark though our constitution allows us to see clients from other London Boroughs.

We provide specialist legal advice and representation, which is free and of high quality in the areas of discrimination, employment, housing, public law,

Noted.

planning, welfare rights, neighbourhood planning issues and asylum/immigration law. We target people who could not otherwise afford to receive legal services. Each year we directly help around 800 people, and reach many more by way of training, information and campaign work. We wish to emphasise that the comments below are made without prejudice to any further submissions we may make on the validity, legality and soundness of the New Southwark Plan.

Ralph Smith
NSPPSV164.1

Further objections to New Southwark Plan

This submission focuses on transport and environmental issues, arguing the only credible way forward is for a new local plan to be drawn up afresh. Although the initial assessment of the New Southwark Plan (NSP) by inspectors focused on housing, find there to be a lack of coherent strategy, the flaws in transport and environmental issues, including air quality, climate change and natural environment, are just as fundamental to strategic planning and the failure to incorporate these issues early on in plan-making would result in as serious consequences. This is all the more so with Southwark having some of the highest air pollution related deaths (equal fourth worst authority in the UK), greatest health inequalities in children and some of the worst traffic congestion. The NSP is neither legal nor sound.

Context

This further consultation is flawed again, as it seeks to limit responses from those who have already commented simply to “the latest proposed changes...and the latest proposed evidence base”. This effectively ignores other changes that are key to answering if the NSP is legal or sound, including:

- Changes to national and regional policy,
- Whether the evidence base is still current in light of the further delay and
- Whether the NPS is effective given the changed external circumstances.

The Inspectors’ Letter (EIP14) sets out concerns that the NSP has no

A detailed response was provided to the Inspectors’ letter with further work undertaken and additional evidence provided.

The Inspectors have confirmed moving forward with the Examination in Public.

Although Covid19 has dramatically affected TfL’s financial position and an ability to progress transport plans that are aimed at achieving change in travel behaviour at present, it is erroneous to assume that this current situation would dictate the future of transport in London or indeed nationally. As vaccinations and treatments against this virus are continuing to be developed and readily available and people/businesses are feeling confident and encouraged to return to work, public transport patronage level would begin to increase gradually with a resulting rise in necessary TfL’s income to fund transport initiatives. It is also worth noting that in the midst of this pandemic, the Council has been able to negotiate S.106 contributions towards transport infrastructure improvements and will continue to do so.

“overarching coherent strategy” and has failed to “consider reasonable alternatives”, then out a non-exhaustive list of significant concerns. Given how much change would be required for the NSP to be found sound, these in turn create practical difficulties in running an examination and fundamental issues of fairness. As seeking to continue with the plan would mean “an extremely complex and uncertain process”, the inspectors suggested withdrawing it and starting afresh. Were this clear recommendation not to be followed, Southwark could seek to make major amendments to the plan so long as “such work is carried out with an open mind and does not seek to simply retro-fit a justification to the plan as it currently stands.”

In Southwark’s response (EIP16) however, officers claim simply to “see no reason to withdraw our plan” and assert there are “no policies which we consider to require substantive changes”, refusing to carry out any serious review of a local plan that is so clearly flawed. In other words the officers’ minds are closed as is conceivable, despite the NSP failing to meet the legal tests.

Changed policy

- Changed policy that requires fundamental change includes Net zero amendment to Climate Change Act 2008: this is so fundamental to multiple policies that the NSP requires revising, rather than seeking to add Supplementary

Planning Documents later;

- Revised National Planning Policy Framework (NPPF) - examples of changed policies below;

- Revised Planning Practice Guidance (PPG) - across multiple relevant areas, though Southwark never has even taken on board new PPGs dating as far back as 2014;

- Revised Network Management Duty (NMD) statutory guidance, which required local authorities to “deliver a lasting transformative change [to] embed altered behaviours...None of these measures are new – they are interventions that are a standard part of the traffic management toolkit, but a step-change in their roll-out is needed to ensure a green restart.”

Changed context

The deterioration to Transport for London's financial situation, including the abandonment of plans for a new crossing in Rotherhithe, likely freeze of the Bakerloo extension (given the fate of Crossrail 2) and cuts to bus services will further constrain deliverability of new development and increase transport externalities. Wider changes to the economy due to COVID-19 will radically change travel patterns in the longer term, whether commuting or for leisure. In light of these changes the NSP is not effective.

Although the NMD statutory guidance was issued in May 2020 on a temporary basis, many of the measures introduced in Southwark and neighbouring boroughs are likely to be permanent. Planning positively will therefore require a higher level of ambition for modal shift still.

Adequacy of proposed changes

The revision to the NSP seeks to rely on Southwark's Movement Plan, even though this was drawn up after the last iteration of the NSP. TfL's assessment in late 2018/9 of Southwark's transport planning was that it was inadequate, in particular around buses, cycling and walking.

Paragraph 104 of the NPPF now requires planning policies to identify and protect sites and routes to widen transport choice, as well as providing for high quality active travel networks and facilities. Southwark's evidence base for cycling is five years old and out of date, ignoring TfL's Strategic Cycling Analysis, and there is no coherent evidence for walking, buses or road danger reduction.

Ralph Smith
NSPPSV164.8

Conclusions

For the reasons set out above

- None of the Area Visions are sound, nor are the Site Allocations
- The Strategic Diagrams on transport are flawed and there ought to be some covering natural environment issues
- The Strategic Policies are neither legal nor sound, nor are the

Noted. These comments are addressed under P44 (healthy developments), P49 (highway impacts), P52 (cycling) and P59 (biodiversity) where comments are made on specific policies.

<p>Implementation Policies in relation to infrastructure</p> <ul style="list-style-type: none"> • The Development Management policies are neither legal nor sound • The Assessments required by statute were wholly inadequate. <p>The only lawful way forward, so as not to breach requirements of fairness, is to withdraw the NSP and start again.</p>	
<p>Denis Loretto NSPPSV500.1</p> <p>I wish to comment under the heading -</p> <ul style="list-style-type: none"> • Anyone who now wishes to comment on the latest proposed changes (the January 2020 schedule of changes and its accompanying tracked change version of the plan and any other changes on or since submission) and the latest evidence base. <p>My comment is that I do not see reference to the following previous commitments and I would ask that these commitments be adhered to -</p> <ol style="list-style-type: none"> 1. 1000 new homes at London living rent. 2. Community-led sustainable energy projects on estates. 3. More water fountains to reduce use of plastic bottles. 	<p>Policies P1 and P4 support the delivery of homes at London Living Rent levels.</p> <p>The draft Corporate Climate Strategy is still in the process of being developed and going through consultation. The details as set out in this strategy once adopted will be reflected in the NSP policy. The strategy itself follows the declaration of a Climate Emergency as set out in SP6.</p> <p>Policy P34 sets the requirement for developments of 1,000sqm or more for main town centre uses to provide free public toilets, public drinking fountains and public seating.</p>
<p>ROK Planning on behalf of tribe Student Housing Ltd NSPPSV499.1</p> <p>NEW SOUTHWARK PLAN: PROPOSED CHANGES TO THE SUBMITTED NEW SOUTHWARK PLAN AUGUST 2020 REPRESENTATIONS ON BEHALF OF TRIBE STUDENT HOUSING LTD I write on behalf of Tribe Student Housing Ltd (Tribe), to submit representations to the consultation on the proposed changes to the</p>	<p>Noted. These comments are addressed under the relevant site/policy.</p>

<p>submitted New Southwark Plan August 2020.</p> <p>The New Southwark Plan (NSP) was submitted for examination in January 2020. As a result of the comments received from the Inspectors since this submission, modifications have been made to the plan beyond those consulted on in previous stages. Therefore, the current version of the plan (August 2020) is currently undergoing consultation. It is understood that following this consultation, the plan will proceed to Examination in Public in early 2021. The representations contained within this letter primarily relate to policy P5 (formerly P24) 'Student Homes', as well as policies P4 'Private Rented Homes', P7 'Wheelchair Accessible and Adaptable Housing', P30 'Affordable Workspace' and P52 'Cycle Parking'.</p>	
<p>Living Bankside NSPPSV239.1</p> <p>Dear Southwark Planning</p> <p>I write on behalf of Living Bankside (formerly Bankside Residents' Forum) which represents 25,000 residents living between the London Eye and City Hall responding to the consultation on the New Southwark Plan.</p> <p>Consultation</p> <p>Whilst there have been numerous consultations on the New Southwark Plan, the reach and quality of the consultations are inadequate. Southwark Council's approach to both its own consultations and that of its requirement/encouragement of planning applicants is frequently and deeply inadequate. It continually fails to ensure protected characteristics not only have been considered but have been effectively engaged to ensure their views are captured.</p> <p>The accessibility of the consultations have been severely limited. By only allowing online responses it discriminated against those without internet access and those digitally excluded. Accordingly protected characteristics such as older people, who are typically digitally excluded have been been deprived of a say on policy change which will impact them. As such the New Southwark Plan fails to meet the standards of equalities legislation.</p>	<p>Noted.</p> <p>A consultation plan and consultation report has been prepared for the previous stages of the consultation process setting out how the consultation is being/has been carried out and how the regulation requirements have been met and the requirements of the Statement of Community Involvement has been met.</p> <p>A consultation report will be prepared for the Council's Proposed Changes to the Submitted New Southwark Plan.</p>

The New Southwark Plan is not legally compliant as the consultation procedure has been changed mid-way through. As the consultation process has not been legally compliant the current iteration of the New Southwark Plan is both unsound and unlawful. The plan is not sound as it is not justified – it has not allowed for effective engagement of all interested parties. The plan is unsound as it is not consistent with the national planning policy in relation to consultation.

It should be noted that even though we responded to the original consultation Living Bankside has not received any direct communications from Southwark Council to further engage in the process. We respond to this latest consultation after being made aware via social media.

Jason Leech Camberwell Society's
NSPPSV365.1

1.1 This statement has been written by Jason Leech, Director of Camberwell & Metropolitan (planning and architecture) and member of the Camberwell Society's Planning Sub-Committee. It constitutes the formal representations of the Camberwell Society about the August 2020 submission version of the proposed New Southwark Plan.

1.2 These representations concern themselves exclusively with residential design and quality and heritage matters, all falling within the section of the proposed local plan entitled 'regeneration that works for all', which comprises proposed Strategic Policy SP2 and its supporting Policies P12-P25. These representations address most but not all of these proposed policies.

1.3 These representations are divided into four sections:

- Section 1 comprises introductory and general points about the whole document;
- Section 2 addresses residential design and quality and policies relating to that;
- Section 3 addresses heritage concerns and policies relating to that;
- Section 4 makes a brief point about Policy AV.05: Camberwell Area Vision.

1.4 Overall, the structure of the New Southwark Plan, whereby strategic

Noted. Responses are provided under the relevant policies.

The Local Development Scheme provides details of further Supplementary Planning Documents to be prepared and the timeframe.

policies are linked directly with specific policies which underpin them, strikes as sensible organisation.

1.5 The formatting within policies is much less user-friendly. Both policy clauses and sub-clauses are in numbers (1, 2, 3), as are the reasons underpinning the policies. They could be much clearer and intuitive if restructured as 1.i, 1.ii and Reasons as A, B, C (or some other permutation using numbers, letters and numerals. The London Plan format could be an exemplar if LB Southwark did not seek an idiosyncratic system.).

1.6 There is insufficient confidence that the promise in the New Southwark Plan is deliverable on the basis of the Council's action to date and the lack of specificity (some might say 'vagueness') prevailing in this submission version. While there is no right or wrong approach between high-level and prescriptive planning, there is concern that a high-level, imprecise local plan will lead to arbitrary exercise of development control in the absence of detailed Supplementary Planning Guidance. If this high-level, prescriptive approach is adopted for LB Southwark's local plan, detailed SPDs are expected to follow soon after its adoption.

1.7 These concerns are not assuaged by the many remaining typos, ungrammatical sentences and poor diction found throughout the document but, fortunately, far less frequently than in the January 2020 submission version. In places, the New Southwark Plan reads like a hastily written university essay. This fails to inspire confidence in the Council's development vision or in the development control it seeks to exercise. In many specific cases, vague or flawed phrasing is so unsound, it will undoubtedly lead to misinterpretation or challenge at appeal on grounds of unlawfulness.

1.8 These grave concerns notwithstanding, the Camberwell Society does laud the Council's ambition for the built environment and reiterates its willingness to assist in the development of an exemplary local plan. The detail within these representations and the frequent reference to other boroughs is given with that good will in mind, to help mould the New Southwark Plan and future development within the borough into something remarkable.

1.9 In this vein, please may it be noted that the Camberwell Society wishes to exercise its right under Section 20(6) of the Act to appear and be heard

<p>during the Examination in Public of the proposed submission of the New Southwark Plan.</p>	
<p>Jason Leech Camberwell Society's Representations NSPPSV365.16</p> <p>P21 Borough views P22 Archaeology P23 World heritage sites P24 River Thames 3.29 The Camberwell Society makes no representations on proposed policies P21-P24 at the present time.</p>	<p>Noted.</p>
<p>Hannah Platt NSPPSV498.1</p> <p>Dear Sir/Madam,</p> <p>I am writing to you in reference to the New Southwark Plan Consultancy. I am a local resident. We are extremely concerned with the scale of redevelopment and regeneration that is planned for our area. This plan was previously supported and would have been enabled by the Bakerloo Line extension which has now been put on hold by TFL London due to financial problems caused by the pandemic. We have to point out that the ambitious aim to double the population of Southwark over the next 10 years must either be re-thought or completely abandoned as it will no long be supported by the infrastructure in terms of transport to support such a huge increase in population. In addition there has been widespread reduction of road capacity to increase cycle lanes and widen pavements for social distancing across the borough since the pandemic started. This has resulted in gridlocked traffic and is causing stress and misery for residents; journey times are hugely increased and as cars are now on the roads for longer which increasing fuel</p>	<p>Noted. 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> <p>These comments are addressed under the relevant site/policy.</p>

emissions. There have also been a huge increase in road rage resulting in altercations on the streets. It's insane to keep reducing road capacity for traffic whilst simultaneously increasing the population. Whilst we can appreciate that the new developments are largely car-free, traffic will still be an issue as those without cars will still be using Ubers and Addison Lee, especially considering that the Bakerloo Line extension has been abandoned. The use of heavy goods vehicles for construction will also cause traffic problems.

Whilst the above outlines general concerns of the residents regarding current building and regeneration issues please see below specific comments on the New Southwark Plan.

Union 4 Planning on behalf of Caddick Development
NSPPSV497.1

Re: Written Representations on the Proposed Changes to the Submitted New Southwark Plan

We act on behalf of Caddick Developments and hereby submit written representations in respect of the Proposed Changes to the Submitted New Southwark Plan.

The New Southwark Local Plan will provide an overarching strategy for managing growth and development across the borough. The Plan sets out how the Council will deliver further regeneration and wider improvements to the borough in the years to come.

Our comments are submitted in the context of our overall support for the Local Plan. Our written representations relate to two specific sections of the New Southwark Plan:

- 1) Housing Policies;
- 2) Economic Policies.

Our written representations are prepared in accordance with Paragraph 35 of the National Planning Policy Framework (NPPF), which outlines that Plans are 'sound' if they are:

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements

Noted.

with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework. The NPPF sets out that the aforementioned tests of soundness

Union 4 Planning on behalf of Caddick Development
NSPPSV497.6

Summary and Concluding Comments

In summary, these representations are submitted on behalf of Caddick Developments in respect of the current consultation on the Proposed Changes to the Submitted New Southwark Plan

We would submit that careful consideration should be given to incorporating a policy on shared living to help address the lack of affordable housing for younger generations, as outlined in Policy SP1.

We also consider that Policy SP28 requires further wording to provide the necessary flexibility of uses required in order to deliver the intensification of industrial use and co-location, which are identified as objectives in the subsequent Paragraph 3 under the policy.

Finally, the current wording of Policy P30 referring to affordable workspace lacks clarity, and we are concerned that it may inhibit the redevelopment of existing industrial sites by businesses that are seeking to remain on-site. In this regard, we consider that Policy P30 is not positive prepared, justified or effective.

In conclusion, we would respectfully submit that careful consideration should be given to the housing and economic policies to ensure that the New Southwark Local Plan can address current demands within the borough,

These comments are addressed under the relevant site allocation/policy.

thereby supporting urban regeneration which provides affordable accommodation and jobs for those who wish to live and work within the borough.

Caroline Courtois
NSPPSV496.1

Dear sir/Madam

In October 2020, the Council delivered an information session to the residents at Pynfolds Estate to let them know about the Southwark Council plan to build an extension to the estate on the existing car park/ recycle waste area/ green patch. A follow up email invited resident to join the Resident Group for the formal consultation.

I joined the group and was sent the email below inviting me comments on - not the Pynfolds Estate plan but what I understand to be the strategic larger New Southwark Plan that will constitute the back bone of further works such as the construction at Pynfolds Estate.

I am therefore writing in response to the invitation below to send comments on the larger New Southwark Plan.

First of all, I would like to express my concern on the credibility of the consultation process when I was sent the invitation on 27 October 2020 (see below) and requested to comment by 2nd November 2020. This means 7 days to review 335 links including to a 394 pages Plan. Knowing the 335 links relate to documents collected through a process undertaken since January 2020 (10 months), I am surprised the Council would find appropriate to give residents 7 days to familiarise themselves with the process, the technical jargon, legal framework and finally the New Southwark Plan (NSP) itself. It makes me wonder how genuine this 'consultation' is? I would be grateful for a response to this critical comment?

Notification of the New Southwark Plan consultation was sent out via email on the day the consultation started (27th August 2020). We recommend you sign up to the planning policy mailing list to be notified of consultation events. Register for a [MySouthwark](#) account and opt-in to our planning policy email updates (click link above).

A consultation plan has been prepared for the previous stages of the consultation process providing further guidance on the consultation process.

Pynfold's Estate is not a site allocation within the New Southwark Plan but any planning application submitted for development will be assessed against the Development Management policies.

Our Examination webpage provides further information on the next steps.

Secondly, I am equally surprised by the lack of clear guidance on the steps for the adoption of the New Southwark Plan (NSP). As a Southwark resident, I have not been provided with a clear sequence on the consultation process and key benchmarks for the adoption of the NSP. It may have been in one of the 335 links I was asked to review in 7 days? it would have been constructive to provide residents with this level of guidance to ensure their proper involvement.

Thirdly, I am again surprised by the sequence of the consultation. If the NSP is the backbone supporting further major works and construction works to create new homes in Southwark - how come we, at Pynfolds Estate, were approached on the Pynfolds Estate extension project even before the NSP was adopted? How can the consultation on the Pynfolds Estate be already engaged while the NSP we should be able to refer to is not yet finalised? How are we as resident supposed to find ground to review whether Pynfolds Estate Extension plans are conform to the requirements in the NSP is not adopted?

Caroline Courtois
NSPPSV496.6

Existing Community

Finally, while I appreciate the effort to aim at building resilient communities, it is regrettable that there is not a repeated and clear, genuine commitment to ensure that the development and major works to be undertaken under this Plan will not be at the detriment of existing residents. While there is a commitment to open space, heritage, cycle routes and so forth, I seem to have found NO mention to ensure that those living in proximity of the major and development works and plans aiming at the creation of home and business space will be compensated for the any loss in their property value due to the construction. Any construction on existing estate should be accompanied by a pre-survey and post-survey to evaluate potential damage

Noted. 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.

and loss of value and offer resident compensation. Plans should be developed in a way to provide benefits to the existing estate residents/ owners/ flats and ensure that any loss of facilities is replaced by improvement that will guarantee that the individual units are not losing any value.

As an example - The Pynfold's estate plan - as introduced recently to the Pynfolds estate residents - will take away car park facilities, create a new close vis a vis for 4 existing units, and will probably mean cutting down 4 trees. The latter is against the principle of the NSP to preserve open space repeated throughout the document. The loss of value for existing flats should be considered if the promised 'Viability appraisals ad reviews' mentioned in the NSP.

Caroline Courtois
NSPPSV496.7

Policies addressed:

New Southwark Plan Strategic Vision

SP1b Southwark's Places

SP2 Regeneration that works for all

SP5 Healthy, active lives.

P44 Healthy developments.

P46 Community Uses

IP6 Monitoring Development

Representations:

I support the Southwark Plan's aspiration to develop a "regeneration that works for all" and, in particular, the changes that have been made to the plan to emphasise the importance of a borough built from a network of distinctive places or neighbourhoods.

However, there are three critical elements that are, at present, missing from

Noted.

Policy SP2 (regeneration for all) and its associated development management policies and Policy SP5 (healthy, active live) and its associated development management policies set out how we will seek to improve the health and wellbeing of residents. Reference is also provided to our social regeneration framework which outlines our ambitions of improving life opportunities, good health and wellbeing and pride of place for all, investing in communities and reducing inequalities. It also confirms that this framework will be implemented through social regeneration charters for different areas. These can be found [here](#).

Policy P46 protects community uses. Their loss will only be permitted in exceptional circumstances where they are surplus to requirements and supported by marketing evidence.

the plan in order to put this core aspiration into action:

Firstly, a definition and evidence base concerning the characteristics of a thriving, healthy or resilient neighbourhood – followed by a clear plan to implement this aspiration.

Secondly – and a critical component of the above – a commitment to protect and develop appropriate community and social infrastructure that can act as the glue for these neighbourhoods.

Without these, the plan would not yet appear to be positively prepared, justified or effective.

Taken together, these missing elements could be captured in a new policy setting out clear details on how the plan will effectively deliver “regeneration that works for all” by working with local residents and partners to build thriving neighbourhoods, and by protecting and developing community and social infrastructure.

Alternatively, I set out below suggestions for how these missing elements can be addressed by amendments to the current policy framework.

Montagu Evans on behalf of Nathaniel Henry Clark
NSPPSV38.1

On behalf of our client, Mr Nathaniel Henry Clark, we have prepared these representations to the London Borough of Southwark (“LBS”) in response to the Proposed Changes to the Submitted New Southwark Plan 2018-2033 (August 2020). More specifically, this representation has been prepared in relation to the Penarth Centre, Penarth Street, London SE15 1TR (the “Site”).
CONTEXT FOR REPRESENTATIONS
Mr Nathaniel Henry Clark is a long leasehold owner of Units 29, 30 & 31 of the Penarth Centre, Penarth Street, SE15 1TR. The Penarth Centre forms part

Noted. This is responded to under the relevant site allocation/policy.

of the draft New Southwark Plan site allocation NSP67.

On behalf of Mr Nathaniel Henry Clark, Montagu Evans have submitted a planning application to LBS for the change of use of the units 29 and 31 from office/light industrial (Use Class B1) to a single live/work unit (Sui Generis). The application was validated by the Council on 23 July 2020 and is currently under determination.

The Applicant also owns the lease for Unit 30, which until recently was leased to a third party and is not currently in use by the Applicant.

These representations are specifically concerned with the Penarth Centre in the context of NSP draft site allocation NSP67: Hatcham Road, Penarth Street and Ilderton Road and proposed draft Policy P30 (Affordable Workspace).

It is acknowledged that the draft New Southwark Plan does not reflect the changes to the use class order that came into effect on September this year.

The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 (SI 2020 No.757) were introduced by the government on 20 July, and took effect on 1 September 2020. The new regulations make changes to the 1987 Use Classes Order.

THE SITE

The Penarth Centre was built in 1957 and comprises a broad mix of uses however the units within the building are occupied predominately as artistic studios and community/faith uses alongside a number of light industrial and retail/wholesale occupiers. The building provides two floors of accommodation with an internal courtyard. At ground floor, units are accessed either from the internal courtyard or from the street. At first floor level, the units are accessed via the courtyard gallery. There is a (partly covered) car park providing 80 surface car parking spaces and a servicing yard which can be accessed from Record Street to the north and Hatcham Street to the east.

Turning to specifically the units 29 and 31, Mr Nathaniel Henry Clark uses Unit 31 with Unit 29 as his main artistic production premises. Unit 29 is the main studio 'production' and 'office' space and Unit 31 contains living accommodation but is also used for certain types of creative work used by himself and his employees.

In terms of immediate surroundings, The Penarth Centre is bounded to the:

- ☒ North by Record Street;
- ☒ East by Hatcham Road;
- ☒ South by Penarth Street; and
- ☒ West by Ormside Street.

The Hatcham Road industrial estate, comprising mainly commercial and light industrial uses within a range of yards and low rise buildings, forms the site's wider context to the south, east and west. Within the industrial estate there are also a number of artists' studios and creative workspaces.

The Site falls within the area to be covered by the Old Kent Road Area Action Plan, a draft of which was consulted on by the Council between December 2017 and March 2018.

Montagu Evans on behalf of Nathaniel Henry Clark
NSPPSV38.6

CONCLUSIONS

In summary, we broadly support the draft site allocation NSP67, however this should be amended to provide greater flexibility with regards to the proposed use classes for the Site, by allowing for live/work units which fall within sui generis use. This will allow artistic and creative uses to effectively operate and flourish within the Penarth Centre, without any restrictions undermining the ability of the Site or its residents. In addition, the Penarth Centre should not be allocated as SPIL as this would not be consistent with the Council's aspiration for the Site to be developed as a cultural and artistic cluster

In addition, draft Policy P30 as currently worded is not considered to be viable and would be contrary to Regulation 122 of The Community Infrastructure Levy Regulations 2010. The current draft Policy would act as a disincentive to small scale commercial developments and proposals seeking the refurbishment and upgrade of existing office stock. This draft Policy should be amended so that AWS provision should only be sought on major redevelopment proposals and should be on the basis of 10% of the proposed

Noted. This is responded to under the relevant site allocation/policy.

<p>uplift in gross employment floorspace. We trust these comments are useful at this stage. By way of this letter we reserve the right to comment on further rounds of consultation and attend the Examination in Public on behalf of our client.</p> <p><i>Please refer to full rep for appendices.</i></p>	
<p>Shiva Ltd NSPPSV297.1</p> <p>Dear inspectors, Shiva Ltd is a local business which owns and operates in The Tanneries, 49-57 Bermondsey Street and 1 Black Swan Yard. We also represent the views of several commercial tenants who occupy our premises in the complex (comprising mainly if Victorian warehouse buildings) of which 55 Bermondsey Street is a Listed Building. We wish to make the following comments in the latest version of the New Southwark Plan and confirm our participation in the oral examination/public hearinfs related t the Examination in Public (EiP).</p>	<p>Noted.</p>
<p>Shiva Ltd NSPPSV297.9</p> <p>The Town and Country Planning (General Permitted Development) (England) (Amendment) (No.3) Order 2020 The NSP does not provide guidelines on the scope of the GPDO 2020 particularly in relation the Bermondsey street conservation area. The GPDO 2020 has the potential to allow free conversion of all industrial and office use building in the Bermondsey street and in its numerous courtyards and alleyways to A3 use. This would cause detrimental change to the character of the conservation area.</p>	<p>The GPDO has a number of limitations for the removal of permitted development rights including development in a conservation area – this should be reviewed to understand the limitations.</p>

Shiva Ltd
NSPPSV297.10

Summary

The NSP is far too generalised and vague to make any significant contribution to the existing planning situation. It allows for a lot of room for developers to maneuverer to get short term benefits at the significant cost of irreversible damage to the historic environment. It is also outdated and does not consider the latest developments in planning.

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

Department for Education
NSPPSV452.1

1. The Department for Education (DfE) welcomes the opportunity to contribute to the development of planning policy at the local level. 2. DfE previously made representations to the Regulation 19 consultation in February 2018, stating the following points:- Clarification that developer contributions should be sought for school places where the places are generated by that development;- Signposting of mechanisms for the securing of developer contributions for funding and land. 3. Under the provisions of the Education Act 2011 and the Academies Act 2010, all new state schools are now academies/free schools and DfE is the delivery body for many of these, rather than local education authorities. However, local education authorities still retain the statutory responsibility to ensure sufficient school places, including those at sixth form, and have a key role in securing contributions from development to new education infrastructure. In this context, we aim to work closely with local authority education departments and planning authorities to meet the demand for new school places and new schools. We have published guidance on securing developer contributions for education, at <https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth>. You will also be aware of the corresponding additions to Planning Practice Guidance on planning obligations, viability and safe and healthy communities. 4. We would like to

Noted.

<p>offer the following comments in response to the above consultation document.</p>	
<p>Department for Education NSPPSV452.3</p> <p>Finally, I hope the above comments are helpful in finalising LB Southwark's Local Plan, with specific regard to the provision of land and developer contributions for new schools.</p> <p>16. Please notify DfE when the Inspector's report is published and the Local Plan is adopted.</p> <p>17. Please do not hesitate to contact me if you have any queries regarding this response. DfE looks forward to continuing to work with LB Southwark to develop a sound Local Plan which will aid in the delivery of new schools.</p>	<p>Noted.</p>
<p>Jeanette Thorne NSPPSV528.5</p> <p>I implore those who can, to listen to the local residents and thinks about what is right for this unique street and its community.</p>	<p>Noted.</p>
<p>HTA Planning NSPPSV530.1</p> <p>HTA Planning are acting on behalf of JH Parkhouse Ltd to provide additional feedback on the forthcoming New Southwark Plan (NSP) following the submission of the plan for examination by the Secretary of State on 16th January 2020, and re-consultation on an amended document which commenced on 27th August 2020 until 26th October 2020.</p> <p>JH Parkhouse Ltd is a joint venture, managed by Joseph Homes. Joseph Homes is a progressive, residential-led mixed use developer dedicated to making life better not just for their homeowners, but for their employees, neighbourhoods and the planet through their 'Live Well' ethos. JH Parkhouse Ltd are the owner of the brownfield site at 25-33 Parkhouse Street, which is a</p>	<p>Noted. Response provided under relevant site allocation.</p>

part of Burgess Business Park. This area is identified for redevelopment within the emerging NSP (NSP 22: Burgess Business Park), and is identified as a development area within the emerging Camberwell Area Plan. These representations are made alongside previous comments made in May 2019 on the Amended Policies Version (APV) of the NSP (under the name Joseph Homes). We would like to reiterate that the previous comments made in May 2019 are still applicable and as such request that they could continue to be considered. They principally relate to Proposed Site Allocation NSP22 for Burgess Business Park.

JH Parkhouse Ltd submitted a planning application to the London Borough of Southwark (LBS) in March 2020 for residential-led mixed use development at 25-33 Parkhouse Street (application ref. 20/AP/0858). The application is currently being determined and the proposals are being refined in response to feedback received during the consultation process. The proposals have been developed in line with the requirements and aspirations of Site Allocation NSP22 and other extant and emerging development plan policies.

Representation	Officer Response
<p>Miscellaneous</p>	
<p>Maria Kepa NSPPSV425.2</p> <p>I am hopeful that the New Southwark Plan will lead to better consideration of what residents need to at least maintain if not improve their quality of life. Currently, as a resident of Pages Walk, I feel that the proposed developments will undermine our community. It is disheartening that certain proposals are even allowed to be put forward. 9 storey glass office buildings in the midst of a 2/3 storey residential brick neighbourhood should not even be allowed to be put forward. As a resident with no urban planning knowledge - it is very difficult for me to argue 'harm' - and yet it is clear to us who live here that</p>	<p>Noted.</p> <p>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</p>

<p>these developments will harm us. Even if I cannot point to a policy or a law. We have desperately tried to keep living here - despite the lack of schools, and good infrastructure. But it is proving more and more difficult to carry on fighting for this. I hope that Southwark Council does not change this area into a transient community where people move out as soon as they have children and an area where only the super rich can hope for a quality of life that we all aspire to. How can we truly support diverse communities and build bridges when all that gets approved are flats for the very rich and office buildings that will tear residential communities apart? How is it possible that the viability of developments is deemed to be a matter for the developer only? Office space currently - when everyone is talking about working from home as the new normal? Buildings that will stand empty will kill not enhance communities. Please do what is right.</p>	<p>identified by the council in our Regulation 123 list.</p> <p>We are in the process of updating our Statement of Community Involvement which will set out how we will consult in plan making and in planning applications. We have also introduced the Development Consultation Charter to hold developers responsible for consulting residents on planning applications and ensure they accurately and honestly report on the comments received and how these have been addressed in and shaped the proposed development.</p>
<p>Konstantinos Varotsis NSPPSV508.2</p> <p>Residents keep on objecting to tall buildings, still the council is considering them. the council leadership is not in touch with it's people.</p>	<p>Noted. Guidance on tall buildings is set out in Policy P16 of the Plan.</p>
<p>Liam Hennessy NSPPSV380.16</p> <p>Without changing how Planning in Southwark is carried out, any version of the New Southwark Plan is of minor consequence. Southwark Council's Planners have for years been ignoring or twisting the current Plan as and when they wish. With apologies to the Bard, the current Southwark Plan "is more honoured in the breach than the observance". When a senior Planner wrote a report on the Aylesbury 'regeneration' for the Planning Committee, his 111 page Report never once mentioned the loss of 778 social rented homes in the regeneration. One of the largest losses of social housing in the UK's history, but neither that fact nor the actual figure were ever explained in the Senior Planner's 111</p>	<p>Noted.</p> <p>As acknowledged in the Aylesbury Area Action Plan, following studying the structural condition of the estate, the quality of the environment and the costs of refurbishment, we concluded that it would cost too much to bring the homes up the decent homes standards. Therefore the Council decided that the best way forward was to demolish the buildings and build a better place which would be much more attractive for people to live and work in. The redevelopment strategy for the estate was agreed in 2005.</p> <p>There is a Council Plan commitment that commits us to guarantee</p>

<p>page Report to the Planning Committee. That's how 'Planning' works in Southwark. (The 778 figure was presented in a matrix of figures that people could work out with time and effort).</p>	<p>developments on council housing land have at least 50% council rented homes and ensure a right to return for council tenants and resident leaseholders so local people can stay in the borough they call home.</p> <p>We are in the process of updating our Statement of Community Involvement which will set out how we will consult in plan making and in planning applications. We have also introduced the Development Consultation Charter to hold developers responsible for consulting residents on planning applications and ensure they accurately and honestly report on the comments received and how these have been addressed in and shaped the proposed development. A ballot is also now required for any new estate regeneration as set out in the Great Estates Programme as agreed at Cabinet in December 2018 in the Great Estates Programme Vision and Approach.</p>
<p>Friends of Stave Hill NSPPSV520.15</p> <p>The New Southwark Plan is to be the framework that shapes this borough over the next ten years. It will influence our housing, our communities, our work and our leisure, our access to nature, commitment to green spaces and biodiversity. These influences will be felt for decades, past the proposed ten year lifetime of the NSP. Where is the provision for critical external evaluation? I would be happier to have seen some indications of measuring success, independent evaluation, external monitoring, a framework of key performance indicators. Without critical evaluation, how can one judge success?</p>	<p>The indicators of the NSP are monitored internally under our Implementation Policies, more specifically policy <i>IP6 Monitoring development</i>. We publish our results in the Authority Monitoring Report (AMR). It sets out what type of development and conservation is taking place and how much. It is used to evaluate whether planning policies are being effective and lets us assess how we can improve policies for future plan-making. Policies will be subject to review on a regular basis as we monitor progress and success throughout the life of the plan.</p>