

Representation	Officer Response
<p data-bbox="185 316 584 347">AV.11 London Bridge Area Vision</p> <p data-bbox="185 355 678 419">Old Bermondsey Neighbourhood Forum NSPPSV132.6</p> <p data-bbox="185 464 958 528">Document: NSP EIP 27A Policy: AV 11 London Bridge Area Vision Not positively prepared justified or effective</p> <p data-bbox="185 536 1115 815">The Area Vision includes some wording the Forum support in the description (references to Heritage, buildings, yards...) and in the directive text (references to distinctive environment, reactivated warehouses.. the fabric of local alleyways and yards to create quiet, green routes with clean air.. the Shard remains significantly taller and more visible than surrounding buildings.. historic railway arches.. Support the development of vibrant new high streets on St Thomas Street, Crucifix Lane and Tooley Street, complementing the distinct character of nearby Bermondsey Street”.</p> <p data-bbox="185 823 1115 1390">However, as per previous representations by the Forum which have not been addressed there is an imbalance in the way the Area Vision is framed whereby the ‘CAZ’ factor literally dwarfs, overshadows and threatens to destroy the unique historic fabric and associated character of the area - particularly when the policy is read in conjunction with the Site Allocations 50 and 51 and the Tall Buildings Policy P16 (see below). At a strategic level the Area Vision and Site Allocations need to be fundamentally reframed to avoid the terminal loss of the character they are apparently setting out to ‘build upon’ and ‘enhance’. An update to the council’s Character Studies for the area, in combination with both a proper reflection on the full version of the Baseline Study (referred to previously in relation to SP2) and on the emergent research on future office needs in the new pandemic situation should form the starting point of a new Area Vision for this area which should be ambitious in its aims to take on the climate emergency and frame sustainable development for the area. As with the relevant Site Allocations for the Forum would be willing to expand on this at the public hearing.</p>	<p data-bbox="1137 464 2067 632">Any development that is brought forward in this area will be assessed against the development management policies outlined in the plan e.g. Policy P12: design of places, P13: design quality, P19: conservation areas. This considers design quality and that impact a development may have on the local heritage and cultural assets.</p> <p data-bbox="1137 679 1951 743">We note your comment regarding the future office need in the new pandemic situation, this will be monitored.</p>

Living Bankside  
NSPPSV239.20

London Bridge Area Vision

Makes no mention of the residents and their needs which live in the area, who are rapidly growing in number.

How does their exclusion ensure regeneration for all? The plan disregards their needs and wishes.

The area vision should mention that development in this area should deliver social rented homes.

The area vision should mention that development in this area should deliver new green space as there is a deficit in the neighbourhood and it is desired by employees and residents.

The New Southwark Plan should reflect Living Bankside's Vision 2035.

The vision sets out that London Bridge will contribute towards meeting the borough's housing needs.

Development coming forward in London Bridge will be required to comply with other policies of the plan, including Policy P1 which requires the provision of social rented and intermediate homes.

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.

Representation	Officer Response
<p data-bbox="188 317 624 347">NSP49 London Bridge Health Cluster</p> <p data-bbox="188 357 714 421">Guys and St Thomas' NHS Foundation trust NSPPSV76.2</p> <p data-bbox="188 467 1111 743">The Trust supports Guy's Hospital's and Guy's Cancer Centre inclusion in the London Bridge Health Cluster allocation, which will allow further redevelopment of the site in the future to provide better healthcare research and education facilities for the Borough. In particular, the acknowledgement that tall buildings may be appropriate, to achieve the aspirations of the allocation, is welcomed. Guy's Hospital is an existing tall building within the site and this should be recognised in any assessments of tall buildings on the site in the future.</p> <p data-bbox="188 753 1111 1029">The Trust also supports the improvement of pedestrian movement within the area as it will allow the new restrictions for social distancing (2m distance) for COVID-19, which is vital for visitors, patients and staff accessing Guy's Hospital or Guy's Cancer Centre. Specifically, given that many users of the hospital will have impaired mobility, it is important that the proposed area will allow enough space for people to travel safely and to not interfere with maintenance of existing facilities and construction of potential development taking place within the Cluster and nearby allocated sites.</p> <p data-bbox="188 1038 1111 1177">The Trust supports the principle of student accommodation within the London Bridge Health Cluster as long as the accommodation is directly linked with the Trust's healthcare facilities to house medical and/or nursing students or similar healthcare trained staff.</p>	<p data-bbox="1140 467 1402 497">Representation noted</p>
<p data-bbox="188 1224 371 1287">Richard Lee NSPPSV148.16</p> <p data-bbox="188 1331 629 1361">Site 49 London Bridge Health Cluster</p> <p data-bbox="188 1367 1111 1433">The change makes clear that this site will impact on significant local green space at Guy Street Park, an important part of the local character of the area.</p>	<p data-bbox="1140 1297 2040 1433">Representation noted. Guys Street Park is designated open space and therefore protected by other policies within the plan. Because the NSP is a strategic document it does not include specific design or tall buildings guidance. It is considered that any development on the site allocation will</p>

The site map is wrong to point to an improvement in pedestrian connectivity when many local residents do not walk on the street, but prefer to use the green corridor from Leathermarket Gardens to Guy Street Park. The 2 gardens together make up a fantastic green space, where you do not feel hemmed in by tall buildings at the moment. There has been a lack of consultation with local people, in terms of what we want for the area, and not considering alternative options proposed by the Old Bermondsey Neighbourhood Plan which proposes a height limit.

adhere to the policies, such as the design polices under SP2, outlined in the rest of the NSP and this will be assessed when the site the comes forward as a planning application.

Representation	Officer Response
<p>NSP50 Land Between Melior Street, St Thomas Street, Weston Street and Fenning Street</p>	
<p>Old Bermondsey Neighbourhood Forum NSPPSV132.7</p> <p>Document: NSP EIP 27A Policy: NSP Site Allocations 50 &amp; 51 and the Site Allocations Methodology background Paper 2020 Not positively prepared or justified, legally compliant or consistent with National Policy These site allocations are not positively prepared or justified because they are unclear, internally inconsistent and because they are not based on robust evidence or on appropriate participation, engagement and consultation. The maps and text are unclear in that they do not describe in any accuracy an acceptable location or height of tall buildings. While most other site allocations similarly fail to locate the location of ‘taller’ buildings in plan, they do sometimes manage to state ‘appropriate height’ s.e.g. NSP 71 and 74. The Site Allocations Background Paper however refers to specific planning applications 18/AP/0900 and 20/AP/0944 (as relevant to NSP 50) and to applications 18/AP/4171 and 19/AP/0404 (as relevant to NSP 51) and also refers to the St Thomas Street Regeneration Charter as relevant to both allocations. The proposed quantum of development however are over double ( 240% at NSP50 and 220% at NSP51) the original projected development capacities which shows that the policies are internally inconsistent whilst also undermining the soundness of their Area Vision AV11. Previous representations/requests for clarity on the formulation of the original projected capacities (FAR) in these cases (in line with the practical steps outlined in the Methodology Paper) have not yet been provided - it is unclear what actual processes were undertaken. In referring to the 4 applications in detail the Background Paper when read in conjunction with the evolution of the site allocations (and the tall buildings policy) to date reveals that the applications themselves have been the drivers</p>	<p>Representation noted.</p> <p>The NSP was strengthened through several rounds of public consultation. The plan is a result of a robust evidence base and amendments made as a result of comments and feedback at different stages of consultation.</p> <p>With regards to comments made on the height of buildings, it is considered that any development on the site allocation will adhere to the policies outlined in the rest of the NSP. Because of this it is not necessary to reiterate the conditions that tall buildings will have to meet as any proposal for a tall building will have to adhere to P16. The site allocations are therefore not providing specific detailed requirements to allow for flexibility in design.</p> <p>The capacity of individual sites is outlined in the Sites Capacity Methodology Report where different options were assessed and their potential capacities calculated. As set out in the NSP Site Allocations Methodology Report, the site allocations do not include indicative development capacities for each site allocation because their purpose is not to provide a detailed design brief for each site. This is as stakeholders were concerned that inclusion of indicative development capacities would pre-empt the outcome of the detailed development management process. This process is outlined in the Sites Methodology Report. This report also outlines alternative options to the sites.</p> <p>The Area Vision is not at odds with the site allocations as the site allocations set out requirements for specific sites while the area vision outlines the overall vision and growth opportunities for the wider area. Any development</p>

for the policy development rather than any understanding or objective assessment of the site or of any genuine engagement. The policies have been developed by the planning team in longstanding private negotiation with the developers - and with deliberate ambiguity therein so as to deceive the locality and ignore clearly voiced local opinion about issues like height and associated harm - there is ample evidence available on this issue and of how the consultation which has taken place in various forms to date (including that of the St Thomas Street Framework- now itself out of date with recent development) has been inadequate, moreover it's mistranslation could be described as positively divisive.

Of the four applications (all of which are in direct contrivance of well documented local opinion) one has been approved by the council (but is long overdue any sign of agreement at the GLA), one is current, one has been rejected and one has been deferred. The latter rejections are in part a result of local opinion finally being reflected to some extent through the Planning Committee process (in which the Forum took a constructive part by facilitating walks and briefings) however the policies themselves now need overdue drastic revision based on genuine consultation in order to frame appropriate sustainable development for the area (as required by the NPPF) - this is something the Forum would like to discuss on both allocations, given the opportunity, at the EiP. As per previous representations, in addition to issues of building heights and density we would like to discuss how the provision of public space can be better framed in terms of overall amount, location and design including landscaping, biodiversity and the affordance of mixed sociality based on an understanding of the existing condition (e.g. the ecological and social values of Melior Street Gardens) in line for example with the aspirations of policies SP2, SP3 and SP6 (as above).

#### Not Effective

In terms of the policy being effective there is a lack of evidence that genuine alternatives have been considered - despite many alternatives being clearly voiced (previously and currently) by the local community who through the Forum are currently trying to engage the council and developers with an alternative positive vision for the area. Similarly to the (related) Tall Buildings

coming forward, including those on site allocations, will be assessed on a case by case basis against the policies in the Development Plan.

Because the NSP is a strategic document it does not include specific design guidance. It is considered that any development on the site allocation will adhere to the policies, such as the design policies under SP2, outlined in the rest of the NSP.

<p>Policy) there is a lack of evidence of local capacity having been properly considered, nor of any flexibility for the significant emergent changes now taking place with regards to viability, office, housing and amenity space needs due to the global pandemic and the climate emergency. Opportunities for these Site Allocations to help support a resilient local economy are not currently being considered, and we would argue that the environments that will be created as proposed will significantly damage rather than support the local economy due to the negative effects of significant overshadowing and wind compounded by the terminal loss of character.</p> <p>Linked to this we would suggest that the need for wording to be strengthened in these site allocations (and likely in other sites, certainly in the background methodology) with regards to the retention (non-demolition) of buildings due to their heritage value (as per previous representations) will be underpinned by the emergent policy on demolition in terms of embodied carbon and building lifecycles.</p>	
<p><b>Richard lee</b> NSPPSV148.17</p> <p>Site 50 &amp; Site 51 St Thomas Street, Melior Street etc Changes made to both sites mention the loss of Melior Street community garden. This is a well maintained space by St Mungo's, who support people who are homeless or who have experienced homelessness. It has a vegetable garden, potting shed and seating; in fact it is something of a green oasis. Vegetables are donated to the adjacent Manna Centre – a day centre for homeless people, many of whom are local rough sleepers. If irreplaceable green space will be lost, the right development is not coming forward for this specific site.</p>	<p>Representation noted. Neither site allocation mentions the loss of Melior Street Community Garden. The garden is designated in the site as Other Open Space. The Design and Accessibility guidance also sets out that 'Any redevelopment should provide public realm enhancements, to offer spaces for meeting, and informal recreation, to allow visitors to explore and enjoy the area.'</p> <p>The design and layout of any future development will be assessed on a case by case basis.</p>
<p><b>Shiva Ltd</b> NSPPSV297.7</p> <p>COVID IMPLICATIONS</p>	<p>Representation noted. The NSP will be reviewed regularly as set out in the Local Development Scheme and will respond to changing circumstances</p>

The NSP also does not allow for any post-COVID analysis of demand for tall building and office use buildings in the NSP50 and 51 area. COVID is being used as an excuse to bulldoze through several changes to highway patterns throughout the borough without prior consultation. We are one of many businesses directly affected by the proposed part of Bermondsey Street

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<p>NSP51 Land between St Thomas Street, Fenning Street, Melior Place, and Snowsfield</p>	
<p>Old Bermondsey Neighbourhood Forum NSPPSV132.8</p> <p>Document: NSP EIP 27A Policy: NSP Site Allocations 50 &amp; 51 and the Site Allocations Methodology background Paper 2020 Not positively prepared or justified, legally compliant or consistent with National Policy These site allocations are not positively prepared or justified because they are unclear, internally inconsistent and because they are not based on robust evidence or on appropriate participation, engagement and consultation. The maps and text are unclear in that they do not describe in any accuracy an acceptable location or height of tall buildings. While most other site allocations similarly fail to locate the location of ‘taller’ buildings in plan, they do sometimes manage to state ‘appropriate height’ s.e.g. NSP 71 and 74. The Site Allocations Background Paper however refers to specific planning applications 18/AP/0900 and 20/AP/0944 (as relevant to NSP 50) and to applications 18/AP/4171 and 19/AP/0404 (as relevant to NSP 51) and also refers to the St Thomas Street Regeneration Charter as relevant to both allocations. The proposed quantum of development however are over double ( 240% at NSP50 and 220% at NSP51) the original projected development capacities which shows that the policies are internally inconsistent whilst also undermining the soundness of their Area Vision AV11. Previous representations/requests for clarity on the formulation of the original projected capacities (FAR) in these cases (in line with the practical steps outlined in the Methodology Paper) have not yet been provided - it is unclear what actual processes were undertaken. In referring to the 4 applications in detail the Background Paper when read in conjunction with the evolution of the site allocations (and the tall buildings policy) to date reveals that the applications themselves have been the drivers</p>	<p>Representation noted.</p> <p>The NSP was strengthened through several rounds of public consultation. The plan is a result of a robust evidence base and amendments made as a result of comments and feedback at different stages of consultation.</p> <p>With regards to comments made on the height of buildings, it is considered that any development on the site allocation will adhere to the policies outlined in the rest of the NSP. Because of this it is not necessary to reiterate the conditions that tall buildings will have to meet as any proposal for a tall building will have to adhere to P16. The site allocations are therefore not providing specific detailed requirements to allow for flexibility in design.</p> <p>The capacity of individual sites is outlined in the Sites Capacity Methodology Report where different options were assessed and their potential capacities calculated. As set out in the NSP Site Allocations Methodology Report, the site allocations do not include specific development capacities for each site allocation because their purpose is not to provide a detailed design brief for each site. This is as stakeholders were concerned that inclusion of indicative development capacities would pre-empt the outcome of the detailed development management process. This site methodology report process is outlined in the Sites Methodology Report and also outlines alternative options to the sites. The Council takes a design led approach to determining indicative capacities as set out in the Sites Methodology report.</p>

for the policy development rather than any understanding or objective assessment of the site or of any genuine engagement. The policies have been developed by the planning team in longstanding private negotiation with the developers - and with deliberate ambiguity therein so as to deceive the locality and ignore clearly voiced local opinion about issues like height and associated harm - there is ample evidence available on this issue and of how the consultation which has taken place in various forms to date (including that of the St Thomas Street Framework- now itself out of date with recent development) has been inadequate, moreover it's mistranslation could be described as positively divisive.

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The Area Vision is not at odds with the site allocations as the site allocations set out requirements for specific sites while the area vision outlines the overall vision and growth opportunities for the wider area. Any development coming forward, including those on site allocations, will be assessed on a case by case basis against the policies in the Development Plan.

Because the NSP is a strategic document it does not include specific design guidance. It is considered that any development on the site allocation will adhere to the policies, such as the design policies under SP2, outlined in the rest of the NSP.

<p>Policy) there is a lack of evidence of local capacity having been properly considered, nor of any flexibility for the significant emergent changes now taking place with regards to viability, office, housing and amenity space needs due to the global pandemic and the climate emergency. Opportunities for these Site Allocations to help support a resilient local economy are not currently being considered, and we would argue that the environments that will be created as proposed will significantly damage rather than support the local economy due to the negative effects of significant overshadowing and wind compounded by the terminal loss of character.</p> <p>Linked to this we would suggest that the need for wording to be strengthened in these site allocations (and likely in other sites, certainly in the background methodology) with regards to the retention (non-demolition) of buildings due to their heritage value (as per previous representations) will be underpinned by the emergent policy on demolition in terms of embodied carbon and building lifecycles.</p>	
<p><b>Richard Lee</b> NSPPSV148.18</p> <p>Site 50 &amp; Site 51 St Thomas Street, Melior Street etc Changes made to both sites mention the loss of Melior Street community garden. This is a well maintained space by St Mungo's, who support people who are homeless or who have experienced homelessness. It has a vegetable garden, potting shed and seating; in fact it is something of a green oasis. Vegetables are donated to the adjacent Manna Centre – a day centre for homeless people, many of whom are local rough sleepers. If irreplaceable green space will be lost, the right development is not coming forward for this specific site.</p>	<p>Representation noted. Neither site allocation mentions the loss of Melior Street Community Garden. The garden is designated in the site as Other Open Space. The Design and Accessibility guidance also sets out that 'Any redevelopment should provide public realm enhancements, to offer spaces for meeting, and informal recreation, to allow visitors to explore and enjoy the area.'</p> <p>The design and layout of any future development will be assessed on a case by case basis.</p>
<p><b>Shiva Ltd</b> NSPPSV297.8</p> <p>COVID IMPLICATIONS</p>	<p>Representation noted. The NSP will be reviewed regularly as set out in the Local Development Scheme and will respond to changing circumstances</p>

The NSP also does not allow for any post-COVID analysis of demand for tall building and office use buildings in the NSP50 and 51 area. COVID is being used as an excuse to bulldoze through several changes to highway patterns throughout the borough without prior consultation. We are one of many businesses directly affected by the proposed part of Bermondsey Street

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<p><b>NSP50 – Land between Melior Street, St Thomas Street, Weston Street and Fenning Street</b></p> <p>Joanne Mackowski NSPPSV523.2</p> <p>"Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? - legally compliant NO            Do you consider this policy is sound? - sound NO            Do you consider this policy is sound? - why not sound - Justified JUSTIFIED            Do you consider this policy is sound? - why not sound - Effective EFFECTIVE            Do you consider this policy is sound? - why not sound - Positively Prepared Positively Prepared            These comments also apply to NSP Site Allocation 51.</p> <p>These site allocations are not positively prepared or justified because they are unclear, internally inconsistent and because they are not based on robust evidence or on appropriate participation, engagement and consultation.</p> <p>The maps and text are unclear in that they do not describe in any accuracy an acceptable location or height of tall buildings. The Site Allocations Background Paper however refers to specific planning applications 18/AP/0900 and 20/AP/0944 (as relevant to NSP 50) and to applications</p>	<p>Representation noted.</p> <p>The NSP was strengthened through several rounds of public consultation. The plan is a result of a robust evidence base and amendments made as a result of comments and feedback at different stages of consultation.</p> <p>With regards to comments made on the location or height of buildings, any development on the site allocation will adhere to the policies outlined in the rest of the NSP. Because of this it is not necessary to reiterate the conditions that tall buildings will have to meet as any proposal for a tall building will have to adhere to P16. The site allocations are therefore not providing specific detailed requirements to allow the development to be designed based on the quantum of land uses that are most beneficial for the area.</p> <p>The Sites Methodology Paper makes reference to planning applications that have come forward throughout the plan preparation. The methodology behind the site capacities is set out in the Sites Methodology Paper.</p>

18/AP/4171 and 19/AP/0404 (as relevant to NSP 51) and also refers to the St Thomas Street Regeneration Charter as relevant to both. The proposed quantum of development is many multiples higher than the original projected development capacities which shows that the policies are internally inconsistent.

In referring to the 4 applications in detail the Background Paper when read in conjunction with the evolution of the site allocations (and the tall buildings policy) reveals that the applications themselves have been the drivers for the policy development rather than any understanding or objective assessment of the site or of any genuine engagement. The policies have been developed by the planning team in longstanding private negotiation with the developers - and with deliberate ambiguity therein so as to deceive the locality and ignore clearly voiced local opinion about issues like height and associated harm - there is ample evidence available on this issue and of how the consultation which has taken place has been inadequate and its mistranslation positively divisive. A most recent example is how the baseline study by Social Life has been translated into the Regeneration Charter.

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

There is no evidence that genuine alternatives have been considered - despite many alternatives being clearly voiced (previously and currently) by

The Integrated Impact Assessment (IIA) report for the NSP Submission Version explains how options for the approach to all Site Allocations were appraised.

<p>the local community. Similarly to the (related) Tall Buildings Policy) there is a lack of evidence of local capacity having been properly considered, nor of any flexibility for the significant emergent changes now taking place with regards to viability, office, housing and amenity space needs due to the global pandemic."</p>	
<p><b>Sian Morgan</b> NSPPSV526</p> <p>NSP50 Land between Melior Street, St Thomas Street, Weston Street and Fenning Street</p> <p>Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? - legally compliant – No</p> <p>Do you consider this policy is sound? – sound – no</p> <p>Do you consider this policy is sound? - why not sound – Justified</p> <p>Do you consider this policy is sound? - why not sound – Effective</p> <p>Relating to NSP50 and 51:</p> <p>I do not consider the policy to be sound due to lack of supporting evidence regarding site allocation methodology and lack of effective community engagement.</p> <p>Inclusion of supporting evidence regarding calculations of site allocations</p>	<p>Representation noted.</p> <p>With regards to the height of buildings, it is considered that any development on the site allocation will adhere to the policies outlined in the rest of the NSP. The site allocations set out the relevant guidance to ensure that there is optimisation of capacity.</p> <p>The capacity of individual sites is outlined in the Sites Capacity Methodology Report where different options were assessed and their potential capacities calculated. As set out in the NSP Site Allocations Methodology Report, the site allocations do not include specific development capacities for each site allocation because their purpose is not to provide a detailed design brief for each site. The Council takes a design led approach to determining indicative capacities as set out in the Sites Methodology report.</p> <p>The Area Vision is not at odds with the site allocations as the site allocations set out requirements for specific sites while the area vision outlines the overall vision and growth opportunities for the wider area. Any development coming forward, including those on site allocations, will be assessed on a case by case basis against the policies in the Development Plan.</p>

Representation	Officer Response
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**NSP51 – Land between St Thomas Street, Fenning Street, Melior Place, and Snowfields**

Liam Hennessy  
NSPPSV380.3

Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? - legally compliant NO  
Do you consider this policy is sound? - sound NO  
Do you consider this policy is sound? - why not sound - Justified JUSTIFIED  
Do you consider this policy is sound? - why not sound - Effective EFFECTIVE  
Do you consider this policy is sound? - why not sound - Positively Prepared Positively Prepared  
These comments also relate to NSP Site Allocation 50.

These comments also apply to NSP Site Allocation 51.

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

The maps and text are unclear in that they do not describe in any accuracy an acceptable location or height of tall buildings. The Site Allocations Background Paper however refers to specific planning applications 18/AP/0900 and 20/AP/0944 (as relevant to NSP 50) and to applications 18/AP/4171 and 19/AP/0404 (as relevant to NSP 51) and also refers to the St Thomas Street Regeneration Charter as relevant to both. The proposed quantum of development are many multiples higher than the original rejected development capacities which shows that the policies are internally inconsistent.

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Representation noted.

The NSP was strengthened through several rounds of public consultation. The plan is a result of a robust evidence base and amendments made as a result of comments and feedback at different stages of consultation.

With regards to comments made on the location or height of buildings, it is considered that any development on the site allocation will adhere to the policies outlined in the rest of the NSP. Because of this it is not necessary to reiterate the conditions that tall buildings will have to meet as any proposal for a tall building will have to adhere to P16. The site allocations are therefore not providing specific detailed requirements to allow for flexibility in design.

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The Integrated Impact Assessment (IIA) report for the NSP Submission Version explains how options for the approach to all Site Allocations were appraised.

policy) reveals that the applications themselves have been the drivers for the policy development rather than any understanding or objective assessment of the site or of any genuine engagement. The policies have been developed by the planning team in longstanding private negotiation with the developers - and with deliberate ambiguity therein so as to deceive the locality and ignore clearly voiced local opinion about issues like height and associated harm - there is ample evidence available on this issue and of how the consultation which has taken place has been inadequate and it's mistranslation positively divisive. A most recent example is how the baseline study by Social Life has been translated into the Regeneration Charter.

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

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

