

# New Southwark Plan Examination

Inspectors:

David Spencer BA(Hons) DipTP MRTPI & Philip Mileham BA(Hons) MA MRTPI

Programme Officer: Jacqueline Christie

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F.A.O. Juliet Seymour  
Planning Policy & Digital Transformation Manager  
Southwark Council

Dear Ms Seymour

## **New Southwark Plan Examination Post Hearings Advice – Proposed Main Modifications and Related Matters**

### **1. Introduction**

- 1.1 The purpose of this advice letter is to confirm matters discussed at the hearings in relation to those proposed main modifications necessary for plan soundness. This letter also identifies a small number of further main modifications which follow from further consideration of matters discussed at the hearings.
- 1.2 At this stage we are not inviting any comments about the contents of this letter from those who have made representations on the Plan.

### **2. The Submitted Plan**

- 2.1 What constitutes the submitted plan is intricate in the case of the New Southwark Plan given the Proposed Submission Version of the Plan was consulted on in early 2018. Following the Council's Proposed Changes consultation in 2020 we are satisfied that the Council's amended policies content of 2019 should be regarded as part of the Plan the Council submitted and intended to adopt. As such the 2019 amended policies version content where unchanged does not need to be identified as either a proposed main modification or an additional modification.

### **3. Procedure for Proposed Main Modifications**

- 3.1 In this letter we refer to two technical terms in respect of making changes to the submitted plan once in examination. The Inspectorate's Procedure

Guide to Local Plan Examinations, also provides a helpful summary at paragraphs 1.3-1.6.

- 3.2 The first term is "main modifications". These are material changes to the submitted Plan which are necessary to make it sound and legally compliant. Main modifications can only be recommended by Inspectors at the request of the Local Planning Authority. The second category is "additional modifications" (commonly referred to as minor modifications). These are proposed non-consequential amendments to the Plan not necessary for soundness. These generally involve changes that enhance the clarity of the plan without materially affecting the implementation of plan policies and to provide factual updates. The examination does not concern itself with 'additional modifications' and these changes are a matter for the Council to make to its plan. It can be beneficial, however, if when consulting on proposed main modifications, the Council also publishes a schedule of its additional modifications for completeness.
- 3.3 As part of the examination of the Plan, the Council has constructively consulted on the 'Council's Proposed Changes' which comprise of a combination of those further modifications put forward by the Council on plan submission in January 2020 (contained in Document NSP01a) together with a number of proposed amendments in response to our initial observations. The 'Council's Proposed Changes' were consulted on prior to the issuing of our Matters, Issues and Questions and the hearings. This approach has beneficially enabled a greater degree of comment and related participation at the hearings on potential modifications to the Plan than would normally occur.
- 3.4 The Council's Proposed Changes presented in document EIP27D total 493 in number. The significant majority would be 'minor modifications' to aid the clarity and factual up-to-datedness of the Plan and so it would not be necessary for us to recommend them for soundness. A number of the Council's Proposed Changes do, however, materially affect policies and allocations in the plan, and so would be necessary for us to formally recommend as main modifications for plan soundness. In follow-up to our discussions at the hearings, we have identified them in Appendix 1 to this letter. We will set out the full reasoning as to why they would be necessary for soundness in our report. In some instances, the detail of these changes will need to be subsequently amended as a result of the evidence presented by the Council (notably in the Strategic Targets Background Paper (Document EIP161), the Strategic Targets Update (Document EIP207), the Sites Methodology Update (EIP82a) and Five and Fifteen Year Land Supply (EIP198) as well as from discussion at the hearings.
- 3.5 Whilst we have sought to be reasonably comprehensive, Appendix 1 is not intended to provide a complete coverage of all potential main modifications. We set out the process for main modifications below in section 6 of this letter. There are also some areas where we need additional information

from the Council, before reaching a conclusion on the final content of the proposed main modifications. This information includes, amongst other things additional evidence to confirm that there would be a five year supply of deliverable housing land as of 1 April 2020.

- 3.6 We recognise that the Council has already consulted on a number of these proposed changes such that additional consultation as part of the proposed main modifications may appear unduly repetitive. Our advice to the Council, reflecting paragraph 6.2 of the Inspectorate's Procedure Guide for Local Plans, is that any change to the submitted plan that we would need to recommend as a main modification will have to be subject to post hearings consultation to ensure that the necessary legal requirements would be met.

#### **4 Proposed Main Modifications**

- 4.1 As a starting point, the following comprise proposed main modifications, which we would need to recommend for plan soundness. These should be presented in a schedule/table and the reasoning for each proposed main modification should reflect one of the four tests of soundness.

- Those 'Council's Proposed Changes' which materially affect the policies and allocations of the Plan (see Appendix 1 to this letter)
- Proposed amendments to strategic targets in Policies SP1a and SP1b reflecting the revised plan period (2019-2036), the Strategic Targets Background Paper (EIP161), the Strategic Targets Update Note (EIP207), areas of open space (MOL, BOL or OOS) proposed to be allocated or amended (EIP82a) and further amendments as discussed at the hearings. Linked to this, the proposed housing trajectory at Policy SP1 and the updated detail at Annex 2 will also need to be the subject of a main modification;
- modifications to policies suggested by the Council in response to recent changes to the Use Classes Order in September 2020 (document EIP162 – Appendix 1);
- those proposed changes in response to updated Climate Change baseline and the published London Plan (presented in documents EIP182 and EIP207);
- Clarifications on the general text on the 'Must', 'Should' and 'May' approach and amended site capacities (Document EIP82a) and amendments to site allocations arising from the Use Classes Order changes (document EIP204);
- The introduction of a site allocation into the Plan (effectively from the Aylesbury Area Action Plan 2010) for the remaining phases of Aylesbury (EIP Document 202a);
- Amendments to Policy IP3 to develop the policy into a comprehensive 'delivery and implementation' policy, including the approach to development viability more widely; and
- Proposed Monitoring Framework (document EIP178).

- 4.2 A key task for the Council is to now compile a draft full list of the proposed main modifications, in plan order, from these various sources.

## **5 Further Main Modifications**

- 5.1 As set out at the final session of the hearings we indicated that we would reflect further on some matters raised at the hearings. There are a small number of policies, where, on reflection we consider further amendments are necessary to ensure a sound plan on adoption. We set these out here and advise that the full reasoning for them will be set out separately in our report.

### Affordable Housing (Policy P1)

- 5.2 Following the close of the hearing sessions, we have considered the Council's evidence in respect of affordable housing on schemes of 9 units and fewer in the context of adopted London Plan Policies H2 and H4. We consider that the scale of need for affordable housing in the Borough combined with the contribution to housing supply made from sites of 0.25 hectares or less and a generally positive viability position indicate the approach to be broadly justified.
- 5.3 However, notwithstanding the above the Council's viability evidence base does not appear to test the viability of site typologies below 6 residential units. Therefore, unless the Council can direct us to where this has been tested in the evidence base, the requirement for on-site provision of 35% affordable housing below this level would not be justified. We consider that there may be potential for sites of 5 units or less to provide a financial contribution towards affordable housing to meet needs subject to individual scheme viability, but this does not appear to be highlighted in evidence. If such evidence is available, we would be grateful if the Council can direct us to it.
- 5.4 Therefore, this additional evidence is needed in order to ensure the policy is justified. Policy P1 would also need to be modified to set out that the lower threshold of 6 units should apply in respect of the provision of affordable housing on-site. Further amendments would also be needed to clarify the circumstances where off-site contributions would be required (i.e. where a whole affordable housing unit(s) would not be able to be secured) and to set out the circumstances where a contribution would be preferable or where contributions would be required to supplement on-site provision to make up to full policy compliance.

### Student Housing (Policy P5)

- 5.5 In order to find Policy P5 sound, the requirement for the proportion of student rooms to be easily adaptable for occupation by wheelchair users

should be reduced from 10% to 5%. Additionally, in order to be in general conformity with the London Plan and otherwise justified, criterion 3 of Policy P5, requiring 35% affordable housing on purpose built student accommodation whose occupation is nominated or provided by universities, should be deleted. We are not proposing that criterion 2 (which would require 35% affordable housing, in addition to 27% affordable student room lets) on speculative purpose built student accommodation at market rents requires modification. The modified policy and supporting text should also present the various tracked changes (as set out in EIP27B) as part of one main modification reference.

#### Gypsies and Travellers (Policy P11) and Houseboat Accommodation (Policy P57)

- 5.6 The submitted the Gypsy and Traveller Accommodation Assessment (GTAA) was available during the Council's Proposed Changes consultation, such that we have been able to take into account representations on its contents. We are satisfied that it is justified in concluding there is no need in Southwark for additional pitch provision against the planning definition contained in the Government's 'Planning Policy for Traveller Sites' (2015).
- 5.7 We consider that the identified figure for culturally appropriate accommodation of 43 pitches for gypsy and travellers households who do not meet the meet the planning definition is soundly based and would meet the related requirements in Section 124 of the Housing and Planning Act 2016. Having regard to the Council's legal opinion (document EIP230), the Public Sector Equality Duty, and NPPF paragraphs 59 and 61, we nonetheless remain of the view that the Plan should recognise the extent of the evidenced needs for culturally appropriate accommodation and the potential pragmatic options to assist delivery, including a positive policy framework at Policy P11 for assessing potential sites / planning applications. We also recognise that providing both permanent and transit sites for households of gypsy and traveller ethnicity remains a strategic matter requiring the efforts of the Mayor and Local Planning Authorities across London following the recent publication of the London Plan.
- 5.8 Having regard to the above, we invite the Council to put forward modifications to the plan to include the following:
- Ensure clarity that Policy P11 will be applied when considering site assessments / development proposals for culturally appropriate pitch/caravan accommodation for households of gypsy and traveller ethnicities who do not meet the planning definition;
  - The 'reasons' text to the policy should make clear that there is an identified need for at least 43 pitches for traveller households seeking culturally-appropriate accommodation, of which 27 pitches are needed in the five-year period 2020/21 to 2024/5;
  - The plan should clearly safeguard existing sites, including Springtide Close, Peckham to assist in meeting needs for culturally

appropriate accommodation and ensure that the policy states that they are “as shown on the Policies Map”; and

- Add a new paragraph to the supporting text clarifying how the Council will consider the potential of new sites as per criterion 2 of the policy, including, where appropriate, the role of other development plan documents, early plan review and collaborative pan-London working with the Mayor and others.

5.9 As well as modifying Policy P11, the Council will also need to ensure that the equalities impact assessment and relevant parts of the Integrated Impact Assessment are up-to-date and available alongside the proposed main modifications consultation.

5.10 As discussed at the hearings, there is a sizeable houseboat community in Southwark and a demand/interest for additional houseboat accommodation. Policy P57 (Open Water Spaces) provides a development management policy to assess proposals for berths and residential moorings. The submitted plan was not informed or accompanied by a wider assessment of houseboat needs in accordance with Section 124 of the Housing and Planning Act 2016. Such work has now been commissioned but the timing of any outputs is unlikely to inform proposed main modifications and we are cautious about further significant delays to the adoption of the plan given the Council’s indication to undertake an early partial review. As such we would be able to find the plan sound on the basis of that the Council has initiated a houseboat needs assessment, the outputs of which, together with any wider London work on houseboat needs, would inform other development plan documents in Southwark and/or early amendments/review of the Plan. We consider, however, that it would be necessary for soundness that the Plan contains content to this effect as a new paragraph to the ‘reasons’ text accompanying Policy P57.

5.11 We do not consider it necessary for plan soundness to roll forward the St Georges Wharf allocation in the Canada Water Area Action Plan (CWAAP16) along the lines suggested in document EIP208.

#### Area Action Plans and Saved Policies

5.12 As submitted and subsequently modified, the Plan was clear that the three extant Area Action Plans (Aylesbury, Canada Water and Peckham and Nunhead) would remain part of the development plan for Southwark on adoption of the New Southwark Plan. As the examination has progressed, that has become less clear, particularly on the basis of a proposed main modification to include the Aylesbury site as a site allocation for the various reasons discussed at the hearings and as set out in EIP Document 202a. Given the comprehensiveness of the New Southwark Plan and various proposed main modifications (Aylesbury, Rotherhithe and Peckham sites), we are unsure what substantive role these three area action plans will perform going forward. It has been indicated that the

Council will await our report before making a formal decision on whether or not these area action plans would be rescinded. It is accepted that this could be an outcome of annual monitoring and review in any event<sup>1</sup>. However, for the purposes of transparency and effectiveness it would be necessary to identify in an appendix, those policies to be replaced by the New Southwark Plan and any 'saved' policies from the AAPs that should be considered alongside the policies of the plan. This should be set out as a main modification.

### Policy SP1 Quality Affordable Homes

5.13 In addition to updating the housing trajectory as discussed at the hearings, as currently presented alongside Policy SP1, the housing trajectory is somewhat disconnected, with limited contextual text. We recommend an additional paragraph in support of Policy SP1 is required for soundness and to assist future decision-making, setting out how the five-year deliverable supply has been measured (annualised trajectory, 20% buffer etc), potential risk points to delivery and mitigation.

## **6. Process for Main Modifications**

6.1 The Council should now prepare a consolidated schedule of all the potential main modifications. The Council should also consider the need for any consequential changes that might be required in connection with any potential main modifications. Unless there are material changes in the evidence base or updates to national policy, we are not anticipating the Council to initiate or submit any new, unexpected main modifications beyond those already identified.

6.2 We will need to see the draft schedule of proposed main modifications and may have comments on it. We will also need to agree the final version of the schedule before it is made available for public consultation.

6.3 The schedule of proposed main modifications should be presented in plan order with proposed new appendices set out at the end (for example – the proposed Monitoring and Implementation Framework). The column that briefly explains the reasons for the main modifications should reflect the relevant tests of soundness. For clarity and to avoid an excessive number of main modifications, it would be best to group all the changes to a single policy together as one main modification. The main modifications should be expressed as changes from the base text of the document NSP01a (without the tracked changes) which combined the 2018 Proposed Submission and 2019 Amended Policies Versions.

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<sup>1</sup> Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and PPG paragraph 61-062-20190315

- 6.4 There are a number of proposed main modifications which would generate changes to the submitted Policies Map. Additionally, the Council has identified a number of areas where the Policies Map needs to be updated and amended for factual and other reasons. It is important that the Schedule of Proposed Modifications to the Policies Map accompanies the consultation on proposed main modifications for transparency.
- 6.5 The Council should also satisfy itself that it has met the requirements for sustainability appraisal by producing an addendum/update to the Integrated Impact Assessment of the submitted plan in relation to the potential main modifications, as appropriate. We will need to see a draft of the addendum/update and may have comments on it. The updated IIA should be published as part of the public consultation on proposed main modifications. The same will apply in relation to the Equalities impact Assessment. The Habitats Regulations Assessment has already been updated during the examination and subject to statement of common ground with Natural England.
- 6.6 Advice on main modifications and sustainability appraisal, including on consultation is provided in the Planning Inspectorate's Procedure Guide for Local Plan Examinations<sup>2</sup> (in particular, see paragraphs 6.1 to 6.12). It should be made clear that the consultation is only about the proposed main modifications and not about other aspects of the plan and that the main modifications are put forward without prejudice to the Inspectors' final conclusions.
- 6.7 The Procedure Guide also states that the general expectation is that issues raised on the consultation of the draft Main Modifications will be considered through the written representations process and further hearing sessions will only be scheduled exceptionally.

## **7. Next Steps**

- 7.1 As discussed at the hearings, there appear to be two broad options for moving forward in terms of timeframes for consulting on proposed main modifications (either in mid-summer or September 2021). We will work with the Council to achieve either option. As part of that process, the Council should revisit its Local Development Scheme to reflect and update the likely revised timeframe for plan adoption.
- 7.2 The Council and representors on the Plan should note that the contents of this letter do not represent our full findings on these matters, which shall be set out in our final report having considered any representations made during consultation on the proposed Main Modifications.

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<sup>2</sup> 7<sup>th</sup> Edition (February 2021)

7.2 We would like to thank the Council for its cooperation during the hearings and the work to date at the various stages of the examination. If you need any clarification on the contents of this letter, please contact us through the Programme Officer.

Yours sincerely

*David Spencer & Philip Mileham*

Inspectors.

Policy/Section	Source	Summary of the Proposed Main Modification	Notes
Strategic Targets	CPC012	Sets out a clear list of strategic targets (objectives)	Figures will need to be revised further following the hearings and revised strategic targets paper / evidence.
Key Diagram	CPC012 EIP181a EIP229	Key diagram and accompanying series of main 'thematic' diagrams	
Strategic Vision	CPC014	Sets out the strategic vision	
Policy SP1a – Development Targets	CPC015 EIP161 EIP207	Sets out scale of development / change over plan period	
Policy SP1b – Southwark's Places	CPC015 EIP161 EIP207	Provides a spatial strategy	
Policy SP1 – Quality Affordable Homes	CPC052-055 EIP161 EIP207	Include housing target; encouraging the minimum 35% provision; and encouraging the principle of the 'fast-track route'	
Housing Trajectory and Annex 2	CPC055 CPC410	Includes a housing trajectory and accompanying table of sources of supply by year. Annex 2 sets out the detail behind the trajectory.	Requires careful attention – to ensure internal consistency Updates following Matter 6 hearing on 28 April 2021.
Policy SP2 Regeneration for All	CPC057 EIP207		CPC058 now superseded by EIP207
Policy SP4 – Strong Local Economy	CPC062 EIP161	Employment floorspace, jobs and retail floorspace targets; clarity that the strategy includes intensifying industrial land and co-locating industrial premises.	
Updated Area Vision Maps	CPC018 Further updates suggested by LPA during hearings		Need to ensure that Area Vision boundaries are on Policies Map
AV.01 – Aylesbury	CPC040 EIP202a	Various updates to growth opportunities text	see also MM re NSP01A Aylesbury

		EIP202a introduces further policy content for Aylesbury	Site Allocation
AV.09 – Elephant & Castle	CPC046	Reference to providing a new ticket hall for Northern Line and BLE	Consistency with Policy IP2
AV.13 – Old Kent Road	CPC047-048 SCG14b - Updated SoCG with TfL 18 March 2021	Revised text on phasing and BLE safeguarding	Consequential Policies Maps mods to show Safeguarding Directions for BLE as per SCG14b
Policy P1 – Quality Affordable Homes	CPC068-070 and 077-081	Lower thresholds of schemes of 10 or more and 9 or less Concept of ‘maximum viable amount’ and a minimum of 35% subject to viability Clarification of ‘fast track’ route and introduce separate fast track route for Aylesbury Update of Table 1 Significantly revised supporting text	
Policy P2 – New Family Homes	CPC086	Definition of family home; remove reference to OKR Area Action Core; clarify criterion 6; significant revisions to supporting text; amended Figure 3 on ‘Family Housing Areas’	
Policy P4 – Private Rented Homes	CPC091-092	Consistency with Policy P1 on minimum 35%; clarification that policy only applies to schemes of 100 units or more	
Policy P5 – Student Homes	CPC096 EIP215	Council proposal to split out Co-Living/shared accommodation as a separate policy (P5a) in EIP215	
Proposed Policy P5a on Co-Living / shared accommodation	EIP215		
Policy P6 – Housing for Older People	CPC097	Definition of affordable housing	
Policy P7 – Wheelchair Accessible and Adaptable	CPC098 EIP214	EIP214 addresses the clarifications required on M4(3)	

Housing			
Policy P11 Homes for Travellers and Gypsies	CPC103	Replace 'facilities' with 'accommodation'	
Policy P12 – Design of Places	CPC104	Amend criterion 2 – wording consistent with national policy on heritage	
Policy P14 – Residential Design	CPC111	Clarifications on open space provision	
Policy P16 Tall Buildings	CPC117-119	Revision of phraseology; amended text consistent with national policy on heritage; amended 'fact box' on what are 'tall buildings'; significantly re-worked supporting text  Additional text re Aylesbury as set out in <b>EIP202a</b>  Inspector advice to LPA in email of 19/4/21 to add "as shown on the Policies Map"	Associated Policies Map modification to include tall buildings layer
Policy P17 Efficient Use of Land	Hearings	replace 'maximises' with 'optimises' – consistency with national policy and London Plan	
Policy P18 Listed Buildings	CPC121 and discussed at hearings	Consistency with national policy	
Policy P19 Conservation Areas	Discussed at hearings	Consistency with national policy	
Policy P21 Borough Views and Annex1	CPC122, and discussed at hearings	Additional wording on Millennium Bridge view; amendments to annex re 45m threshold plane for St Pauls Also include the modified 'Fact Box' for completeness	
Policy P25 Local List	CPC126	Criteria for Local Listing	
Policy P27 Access to employment and Training	CPC128-129	Clarification that the measurement is gross floorspace and new criterion on payment in	

		lieu	
Policy P29 Office and Business Development	CPC136-137	New criterion 3 – loss of emp floorspace triggering a need for financial contribution	
Policy P30 Affordable Workspace	CPC139-150 EIP217	Various clarifications for effectiveness and new criterion 4 about alternatives to affordable B class workspace  For completeness the MM should also include the amended Fact Box and the updated Fig 5	EIP217 contains 2 mods that should be presented as part of one composite MM to Policy P30 and supporting text.
Policy P32 Business Relocation	CPC153-157	Various material clarifications for effectiveness	
Policy P33 Railway Arches	CPC158	Internal consistency re use of arches as SPIL and effectiveness re delivery of Low Line routes	
Table 7	CPC162	Separate OKR from one major town centre to two separate district town centres.	
Policy P40 Hotels and other visitor accommodation	CPC172-173	Material amendments to policy for effectiveness	
Policy P42 Outdoor Advertisements and Signage	CPC175	Deletes criterion 5 – necessary for consistency with national policy and for plan to be justified.	
Policy P44 Healthy Developments	CPC177 EIP179 – SoCG with Sport England	Necessary for policy to be justified and effective	
Policy P45 Leisure, Arts and Culture	CPC180	Additional text necessary for effectiveness on replacement facilities and proposed losses	
Policy P46 Community Uses	CPC181 EIP162 EIP179 – SoCG with Sport England	Necessary for policy to be justified and effective  Update Fact Box to P46 to reflect UCO	
Policy P47 Hot food takeaways and Figure 7	CPC184; add primary schools for consistency with	Additional criterion 5 needed for effectiveness	

	London Plan; update Figure 7		
Policy P51 Low Line Routes	CPC187	Materially affects the policy	
Policy P52 Cycling, and Tables 9 & 10 Figure 9	CPC188; EIP177	Conformity with London Plan  Update Figure 9 (Southwark Cycling Spine diagram)	The update to Figure 9 (EIP228) should be included as part of the Council's minor modifications
Policy P53 Car Parking and Table 11	CPC189; EIP177 EIP202a	Effectiveness and conformity with London Plan Revised standards set out in EIP177 Adjustments for Aylesbury set out in EIP202a	
Policy 56 Open Space			Amendments to Policies Map – to correct/extend MOL and BOL.
Policy P57 Open Water Spaces	CPC194		
Policy P59 Biodiversity	CPC196	Materially affects the policy, introduces new criterion 2 re offsite contributions to secure overall net gain	
Policy P61 Reducing Waste	EIP218	Council's proposed changes on Policy P61 and circular economy presented in EIP218	
Policy P64 Improving Air Quality	CPC201	Material amendments – criteria removed and new criterion introduced seeking financial contributions	
Policy P65 reducing noise pollution and enhancing soundscapes	CPC202	New criterion 3	
Policy P67 reducing flood risk	CPC203	New criterion 2; proposed removal of requirement for individual FRA	
Policy P68 sustainability standards	Hearings – proposed changes re Climate Change		
Policy P69 - Energy	CPC205 and Hearings –		

	proposed changes re Climate Change		
Policy IP1 – Infrastructure	CPC206		
Policy IP2 Transport Infrastructure	CPC207 SCG14b Addendum SoCG with TfL		
Policy IP3 – CIL and S106 planning obligations	Hearings – need to remodel into a ‘delivery’ policy, that also includes viability and prioritisation EIP217	Suggested amendments in EIP217	
Policy IP6 Monitoring	Hearings – link to new monitoring framework EIP178 Council suggest further changes in Viability Update Note EIP217.	Need to include a monitoring framework (provided as EIP 178) Suggested changes in EIP217 to policy IP6 wording should be included as part of a MM for completeness, as it materially affects the policy	
Site Allocations Introduction, including text on Must Should and May	CPC0212 EIP82a	Necessary for effectiveness	
Site Allocations general Site Capacities UCO changes Open Space provision	CPC216 EIP82a Hearings EIP204	amend indicative capacities to ‘minimum’ capacities except on the 2 sites referred to by LPA  update use classes to reflect Sept 2020 changes as set out in Table 1 in EIP204  Where on-site open space is presented as a % of site area to replace with sqm figure.	Effectively, most site allocation policies would be caught by both of these changes. Each site policy would need to be covered by a related main mod ref but made clear which aspects are MMs  The site allocations need to be presented consecutively
Policy content for each site on ‘Site Location’	Modifications on submission – introducing significant new text	Principally factual – minor mods; generated very little comment at CPC stage	
NSP05 1 Southwark Bridge Rd and Red Lion Court	CPC229	Links to Cycle Super Highway 7	

NSP08 Swan Street Cluster	CPC234 Hearings	Split site into 3 distinct allocations and amend education uses from Must to Should	
NSP13 Conoco House	CPC242	Revised approach to almshouses and requirement to provide new connecting routes	
NSP18 McLaren House	CPC249	Introduces site requirements (musts)	
NSP22 Burgess Park	CPC256-259 EIP204	Removal of B2 as a should use; requiring individual plot rather than aggregate employment floorspace reprovision/increase  EIP204 – revised design and access guidance to sync with revised requirements on employment format provision	
NSP25 Camberwell Bus garage	EIP204 SCG14a – with TfL (February 2021)	revised text on retaining “bus capacity”	
NSP26 Walworth Bus Garage	EIP204 SCG14a – with TfL (February 2021)	revised text on retaining “bus capacity”	
NSP27 Land between Camberwell Station Rd and Warner Rd	CPC273	Re-categorise replace community uses as a ‘must’, rather than ‘may’	
NSP32 Camberwell Green Magistrates Court	CPC279	Re-categorise town centre and community uses as a ‘must’, rather than ‘should’ & ‘may’	
NSP34 Guys and St Thomas Rehabilitation Centre, Crystal Palace	Hearings EIP201 SoCG with Guys and St Thomas’ Trust	Amend capacity from 51 to 103	
NSP36 Kwik Fit, Grove Vale	CPC285	Re-categorise “provide new green link” from a ‘must’ to a ‘should’	
NSP38 Railway Rise	CPC289-290	Introduce requirement to replace existing amount of emp floorspace on site and delete requirement to provide link to site of former East Dulwich	

		Community Hospital	
NSP41 Newington Triangle	CPC293 EIP204 EIP205 (SoCG with Berkeley Homes)	Update existing uses on the site Amend requirements on re-providing employment floorspace	
NSP48 Bath Trading Estate	CPC309	Re-categorise providing new homes from 'may' to 'should'	
NSP52 Colechurch House	CPC317	Re-categorise 'uplift' in office floorspace to 'provide at least the amount of employment floorspace'	
NSP53 Bricklayers Arms	EIP204	Remove reference to hosting a BLE station	
NSP55 Mandela Way	CPC324-325	Introduce requirement to provide at least same amount of employment floorspace as a 'must'	
NSP56 Tesco and Southernwood Retail Park	CPC328-329	Amend requirement to provide at least the amount of retail floorspace currently on the site	
NSP58 96-120 Old Kent Road	CPC333 CPC335	Amend requirement to provide at least the amount of retail floorspace currently on the site	Policies Map modification re amended boundary to include Victory House church
NSP61 4-12 Albany Road	CPC341	Introduce requirement to provide at least the amount of reemployment floorspace currently on the site	
NSP62 Former Southern Railway Stables	CPC344	Amend requirement to provide at least the amount of employment floorspace currently on the site	
NSP63 Glengall Road, Latona Rd	CPC349	Amend requirement to provide at least the amount of employment floorspace currently on the site	
NSP64 Marlborough Grove	CPC352	Amend requirement to provide at least the amount of retail floorspace currently on the site	
NSP65 Sandgate	CPC355-356	Amend requirement to	

Street and Verney Road		provide the same the amount of retail and employment floorspace currently on the site	
NSP66 Devon Street and Sylvan Grove	CPC360-361	Amend requirement to provide at least the amount of employment floorspace currently on the site and to require new access road to IWMF	
NSP67 Hatcham, Penarth and Ilderton	CPC365 EIP204	Amend requirement to provide at least the amount of employment floorspace currently on the site  EIP204 – expand and list Penarth Centre in ‘may’ uses	
NSP68 760 & 812 and 840 Old Kent Road	CPC369-370	Amalgamate sites Amend requirement to provide at least the amount of retail floorspace currently on the site	
NSP69 684-698 Old Kent Road	CPC373	Amend requirement to provide the same the amount of retail and employment floorspace currently on the site	
NSP71 Aylesham Centre	CPC378 SCG14a – with TfL (February 2021)	Introduce requirement to provide the same the amount of retail floorspace currently on the site; delete cross reference to PNAAP1 Revised text on bus station capacity	
NSP72 Blackpool Road	CPC383 Update on existing uses – EIP197b SoCG with Eileen Conn	Delete requirement to provide new north-south green link	
NSP73 Land Between the Railway Arches	Hearings EIP204 – modify uses on the site	Delete cross reference to PNAAP3 EIP204 – introduces leisures uses and moves community uses from ‘may’ to ‘must’ (as part of Council’s new definition of ‘retail, community or leisure uses’ to reflect Class E.	

NSP74 Copeland Industrial Park	Hearings	Delete cross reference to PNAAP4	
NSP76 St Olav's Business Park	CPC394	Amend requirement to provide the same the amount of employment floorspace currently on the site	
NSP77 Decathlon Site and Mulberry Business Park	EIP199 SoCG with Art Invest Real Estate	Amended indicative site capacity	
NSP81 330-344 Walworth Road	CPC405	Introduce requirement that site must re-provide affordable retail space	
NSP01a Aylesbury	Hearings EIP202a	EI202a sets out text for new allocation NSP01a	Consequential Policies Map mods
Glossary	Hearings – EIP204 include new definition of retail, community or leisure uses to reflect new UCO		