



No.	Title
Appendix A	New Southwark Plan Proposed submission version : Publication Version
Appendix B	New Southwark Plan Proposed submission version : Consultation Plan
Appendix C	New Southwark Plan Proposed submission version : Consultation Report
Appendix D	New Southwark Plan Proposed submission version : Integrated Impact Assessment
Appendix E	New Southwark Plan Proposed submission version : Habitats Regulations Assessment

The New Southwark Plan: Proposed submission version

Consultation Report on Preferred Option

29 November 2017

1. Introduction

1.1 What is the New Southwark Plan?

The New Southwark Plan is a borough-wide planning policy document which will guide regeneration and development in Southwark. It is therefore essential that the plan is developed in meaningful consultation with key stakeholders, such as residents, community groups, workers, landowners and developers, which have an interest in the future of the borough.

The New Southwark Plan, which is being developed over a three year period, will replace the Core Strategy (2011) and saved Southwark Plan (2007) policies. The plan will enable the borough to deliver the homes and jobs which are needed to make the borough a better and more sustainable place to live and work.

1.2 What is this consultation report?

The purpose of this report is to summarise the consultation carried out at the Preferred Option stage. It summarises the comments received by the Council through the initial two stages of consultation plus an interim consultation. Section 2 of this report explains these stages of consultation. After each later stage of consultation we will update this report to reflect the most recent consultation.

At each stage of consultation we carry out activities in accordance with our Statement of Community Involvement (SCI) (2008). The SCI sets out how the council will consult on all of our planning policy documents. The SCI refers to a number of legal and regulatory requirements, both in terms of methods of consultation and also particular bodies that we must engage with, and sets out how we meet these requirements. When the SCI was produced it was done so with regard to the Town and Country Planning (Local Development) (England) Regulations 2004 and the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008. In April 2012, both sets of regulations were replaced by the Town and Country Planning (Local Planning) (England) Regulations 2012. Consultation and procedure has been carried out in accordance with the revised Regulations.

The Localism Act 2011 introduced the “duty to co-operate”, which requires us to engage with a range of bodies on an ongoing basis as part of the production of planning policy documents. Much of the process that is required by the duty is already covered in our SCI and has been an integral part of the preparation of new planning policy in the borough. We will ensure that we meet the requirements of the duty to co-operate at every stage of consultation. This will involve writing to and where appropriate meeting and working with our neighbouring boroughs, the Greater London Authority and other prescribed bodies such as Historic England and Transport for London.

2. Stages of Consultation

2.1 What stages of consultation have been completed so far?

This document explains the consultation that has been undertaken in preparation of the New Southwark Plan: Proposed submission version document. To date the Council has undertaken four stages of consultation to inform the formulation of draft Local Plan policies.

Let's talk about your high streets	Informal consultation took place between October 2013 and February 2014
New Southwark Plan Options (Draft Policies and Area Visions) (2014)	Consultation took place between 3
New Southwark Plan Preferred Option Part 1: Policies	Consultation took place between October 2015 and February 2016
New Southwark Plan Preferred Option Part 2: Site Allocations and Area Visions	<p>Informal consultation took place throughout 2016 where draft visions for each area that were consulted on previously were placed on the council's website and comments invited on areas and vision content. In November 2016 the council circulated a reminder email to the policy consultation list inviting any further representations in preparation for the drafting of the visions and site allocations. Officers attended key stakeholder groups in visions areas to discuss the content of visions.</p> <p>Formal consultation took place on this document from 6 February 2017 to July 2017.</p>
New Southwark Plan Preferred Option Part 3: Interim Consultation	An interim consultation on a set of 'New and Amended policies' took place from June to September 2017.
New Southwark Plan: Proposed submission version	<p>An informal consultation will take place on this document from 25 October 2017 to 01 December 2017.</p> <p>A formal consultation will take place from 01 December 2017 to 12 January 2018.</p>
Public examination	2018
Adoption	2018

The first stage of consultation, conducted between October 2013 and February 2014, was called '**Let's talk about your high streets**'. This was a very informal initial stage of consultation to get people thinking about their high streets and what they want from them. This consultation helped shape area visions and planning policies for the New Southwark Plan Options Document.

The second stage of consultation was on the **New Southwark Plan Options Document (Draft Policies and Area Visions)**. The Options consultation set out an initial draft of the New Southwark Plan with options on policies where there were different ways that policies could be taken forward to deliver Southwark's strategic development objectives. A full public consultation on this version of the New Southwark Plan was undertaken between 31st October 2014 and 6th March 2015. The Council sought the views of the full range of statutory and non-statutory stakeholders on the draft policies.

The third stage relates to the Preferred Options Stage which in itself was comprised of three parts. Between October 2015 and February 2016 the council consulted on the Preferred Option draft of the policies of the New Southwark Plan, including high-level strategic policies, set out across the key "fairer future" themes that the council will help to deliver (such as "Quality Affordable Homes" and "Cleaner, Greener, Safer").

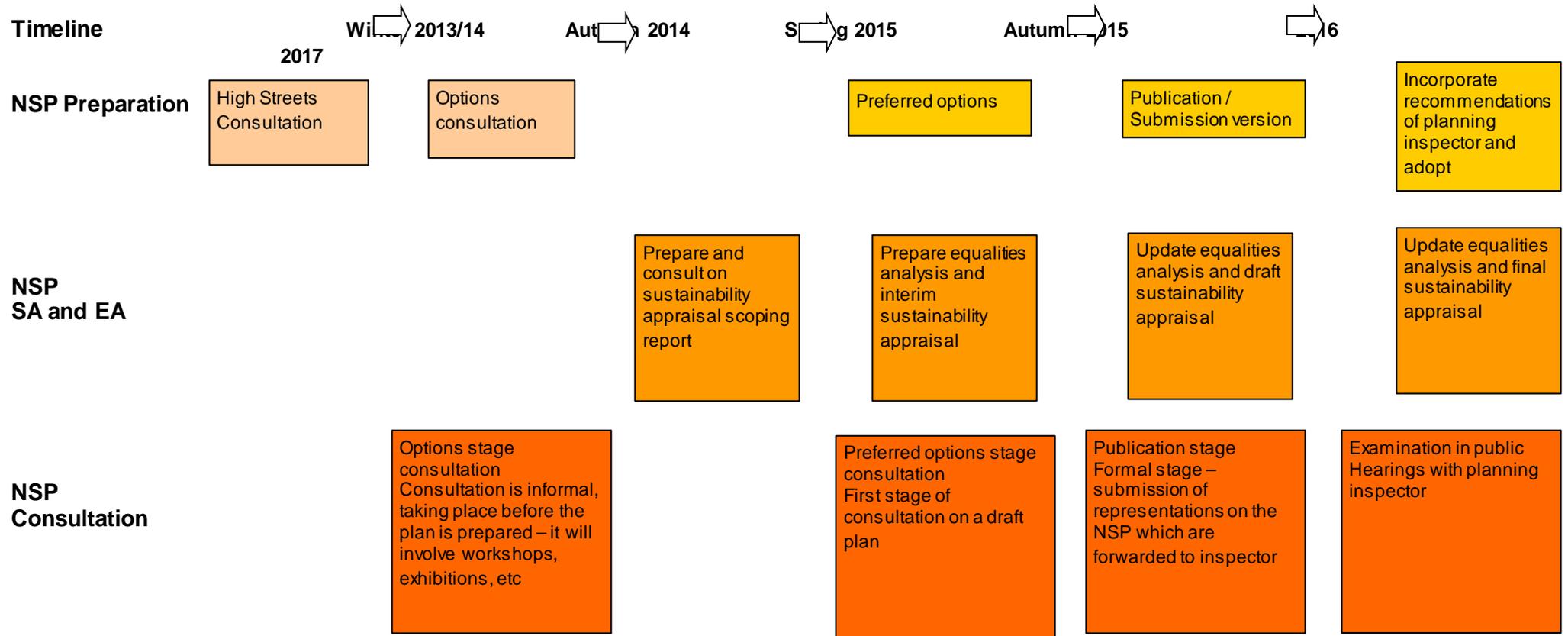
The council then consulted on stage 2 of the preferred Option stage: Area Visions and Site Allocations. Area Visions provide the strategic vision for the future of Southwark's distinct places and neighbourhoods and set out key infrastructure enhancements, opportunities for public realm and transport improvements and growth opportunities for new homes and jobs. Area Visions also identify the prevailing character of different places to be renewed, retained or enhanced. Site Allocations are planning policies relating which apply to key potential redevelopment sites. Consultation was held from February 2017 to July 2017.

Before producing the final drafts of the document and after having had the opportunity to review the responses received during the first two stages of the preferred option, the council then produced a small set of New and Amended policies which were then consulted on in an interim consultation from June to September 2017.

This report identifies how the representations received by the Council at the different Preferred Options stages of consultation completed to date have influenced the draft policies.

The diagram overleaf provides an overview of the stages involved in preparing the New Southwark Plan and the consultation involved at each stage. It shows the High Streets and Options consultation stages that have been completed and the next Preferred Options stage (described in the next section).

Diagram 1: Stage of NSP preparation and consultation



2.2 What happens next?

The **New Southwark Plan: Proposed submission version document** has been prepared for consultation from 25 October 2017 until 12 January 2018. This includes a preliminary informal consultation period followed by a formal consultation period.

The Council will seek the views of the full range of statutory and non-statutory stakeholders on the policies. Stakeholders are requested to submit full and detailed comments, if necessary these should be backed up by evidence, to justify any support or opposition for the draft policy proposals. All consultation responses will be published by the Council in full.

Once we have finished consulting on the New Southwark: Proposed submission version , we will collate all the responses we receive and see whether we need to amend the plan to take into account the responses. We will provide officer comments on all the responses we receive which will set out whether we have changed the plan to reflect the response, and will explain our reasoning for why we have/have not amended the plan.

The Proposed submission version policies is the version of the plan the council intends to adopt following a public examination by a planning inspector. Prior to this, we are publishing it for a final stage of consultation to ensure that all residents and visitors have the opportunity to comment on our final policies before examination.

We will then submit the New Southwark Plan to the Secretary of State for a public examination by a planning inspector. Participants of the final stage of consultation have the right to represent themselves at the public examination.

The inspector will prepare a report for the Council and may require changes to be made to the plan. The final New Southwark Plan will then be adopted by the Council. This is a decision taken by all Councillors at the Council Assembly.

3. Summary of the Consultation

3.1 Who was consulted and how?

The Preferred Option stages involved many different elements. All non-statutory consultees on the planning policy database were emailed throughout the Preferred Options stage and sent physical mail out which set out the timescale for consultation and how people can comment on the NSP: Preferred Option versions.

The emails also invited any local groups to contact us if they would like us to attend their community meeting to discuss the contents of the draft plan which Officers attended several local stakeholder group meetings throughout the consultation period.

Physical mail out was also sent to all landowners/leaseholders/occupiers of the proposed Site Allocations to ensure that all were made aware of the site allocation proposals and to ask for comments and feedback.

An online consultation survey was set out for each stage of the consultation, providing an online platform to submit comments related to each policy, area vision and site allocation at the three different stages of the Preferred Option Consultation. Consultation was also notified through the consultation webpage, emails, physical

letters, site notices and on local newspapers which can be found in Appendix A: Consultation Materials.

3.3 Summary or representations made and how these have been taken into account:

The following tables provides detailed summaries of the representation made on the strategic policies, development management, area visions and site allocations along with an officer response to each representation. Where relevant the response provides details of how representations were taken into account in developing the New Southwark Plan: Proposed submission version of the New Southwark Plan.

We received a total of 1643 written responses at the Preferred Option Consultation and an additional 5279 responses relating directly to the Multi-story car park in Peckham. Other representations included a questionnaire with 130 respondents and a petition containing 110 signatures.

In response to the consultations the proposed Area Visions and Site Allocations have been amended to reflect the representations received. Together with other amendments to sites made, the New Southwark Plan now contains 2 new site allocations: NSP14 Old Jamaica Road Estate and the Goose Green Trading estate. The New Southwark Plan: Proposed submission version also contains a list of site allocations for Old Kent Road.

Comments in relation to site allocations and the vision for the Old Kent Road will be reported separately consultation summary on the draft Area Action Plan.

Table 1 sets out all the consultation events we attended during the consultation periods.

3.3.1 Specific responses

The specific responses have been summarized in a table below alongside the council's response.

**New Southwark Plan Preferred Option Policies
Strategic Policies Consultation Summaries**

SP1 Quality affordable homes

Comment Summary	Council Response Summary
Social Housing / direct delivery:	
Affordable housing policy should prioritise the delivery of social rented housing above all other kinds. Some opposition has been levelled towards other types of affordable housing such as affordable rent and other intermediate affordable housing products.	The affordable homes policy prioritises social rented housing, while also requiring some intermediate tenure housing. The council's evidence indicates a range of affordable housing is needed.
There was some concern expressed whether the direct delivery of 11,000 council homes can be achieved in an equitable and sustainable manner within the New Southwark Plan framework, in for example maintaining the distinction between suburban and urban areas.	Applications will be assessed against policies throughout the NSP to ensure that development is equitable and sustainable. The optimising delivery of new homes policy requires the efficient use of land in both suburban and urban areas, consistent with their character and with the opportunity to increase densities where exemplary standards of design are proposed.
Affordable housing policies should be more explicit in detailing the requirements for off-site provision of social housing. In particular, clarity should be provided as to where it will be provided as policy is too vague at present.	<p>The affordable homes policy provides further detail on requirements for affordable housing. Off-site affordable housing or, if not possible, in-lieu payments towards council house building will be required in exceptional circumstances where affordable housing cannot be provided on site.</p> <p>The location of off-site provision or council house building would be assessed against policies throughout the NSP to ensure it is suitable. The council publishes information about where new council homes will be delivered following in-depth consultation and invites residents to suggest further locations.</p>
Affordable housing target:	
The affordable housing target should be set to align with the timeframes of the plan period rather than to 2043 as is currently outlined.	The target for 11,000 council homes by 2043 is set by the Fairer Future promises in the Council Plan.
The policy should also set the overall housing target for the borough over the plan period, using the annual target (2,736 units per annum) as set out in the London Plan.	The overall housing target is set by the London Plan and may be updated following review of that plan. The NSP makes reference to the current target in the reasons but it is not included in the policy as it may be updated throughout the plan period.
Respondent considers that the target of 11,000 new council homes by 2034 is insufficient to meet demand, particularly given the number of homes lost as a result of the sale of Council homes under right to buy. One respondent has recommended the council should make a commitment to build 11,000 net additional council homes to the existing number of council homes at the start of the plan period.	<p>The target for 11,000 council homes by 2043 is set by the Fairer Future promises in the Council Plan. Policies in the NSP seek to maximise the delivery of affordable housing including and in addition to the 11,000 new council homes by 2043. Policy SP1 has been updated in the PSV to state that the council will endeavour to secure 50% of all new homes as affordable homes.</p> <p>A net target for additional council homes would have to take into account right-to-buy sales which are outside of the council's control.</p>

This section should note that the 2,736 new homes per year that the borough is committed to delivering is Southwark's minimum annual average housing supply target and that the borough should augment this figure to close the gap between local and strategic housing need and identified supply in line with London Plan policy 3.3Da.	The requirement to augment the housing target is set by the London Plan. The NSP effectively seeks to augment the target by identifying site allocations, requiring the optimisation of housing delivery, supporting high density development, facilitating infrastructure provision to underpin delivery and supporting the transition of industrial land to mixed use neighbourhoods including housing.
The need to deliver additional homes needs to be balanced against the provision of uses to support commercial growth in regeneration areas.	The NSP protects sufficient industrial land and other business floorspace as well as requiring an uplift of commercial space in the Central Activities Zone town centres, and opportunity areas. This will ensure a balance with housing delivery.
The Options version of NSP (2014) Southwark said it would not be possible to build 2,736 homes p.a. without it meaning "higher densities, lower standards and release of protected land". Respondent has commented that the Preferred Option version has not provided explanation or justification for why this higher figure has been taken forward.	The 2,736 figure has been adopted within the London Plans since the NSP 2014 options consultation. The PSV also confirms that we have identified sufficient sites to meet this target.
General amendments to policy:	
The respondent is opposed to starter homes which should not be considered an affordable housing product.	The Housing and Planning Act 2016 establishes starter homes as an affordable housing product in law.
Several respondents have suggested the Plan should respond to the provisions set out in the Housing and Planning Bill and acknowledge the likely impact on the proposals of the New Southwark Plan. One respondent was sceptical with regard to the Council's ability to restrict the delivery of starter homes as proposed in the consultation document, in light of the provisions of the Housing Bill.	The plan is considered to be in conformity with the Housing and Planning Act 2016. Government has not produced the regulations to require starter homes and the government white paper Fixing Our Broken Housing Market 2017 indicated a change in direction for national policy.
Affordable housing policies should be tighter to clamp down on developer tactics which seek to secure the minimum levels of affordable housing, such as segmenting developments in several different planning applications or 'designing out' affordable housing on viability grounds due to separate entrances and residential cores.	Affordable housing requirements have been updated in the PSV in the affordable homes policy. The policy prevents circumvention of affordable housing requirements by subdivision and requires fully accountable viability reviews of development that would not meet the requirement.
The New Southwark Plan should go further than fixed term tenancies and introduce permanent tenancies support healthy and stable communities.	The private rented homes policy requires 3 year fixed term tenancies for purpose-built private rented housing. Tenancies of this time will give greater security than the current market norm of 6-12 month tenancies. The council recognises the potential of purpose built private rented housing to increase housing supply and to provide a higher standard of management for tenants. Permanent tenancies would be a disincentive for developers and discourage this form of housing and the benefits it could bring.
A more detailed housing capacity analysis should reflect the potential for large sites to define their own densities in line with London Plan policy 3.7.	Development can exceed the density ranges subject to achieving an exemplary standard of design. The policy does not preclude larger sites from achieving density in excess of the ranges.
Integrated Urban Management (IUM) plans and maintenance should be implemented to ensure good standards of delivery are not compromised by the need to build more densely. This should encompass scrutiny of the NSP's DM policies – notably design; heritage; infrastructure; public realm and transport; culture and community use.	Policies have been prepared in an integrated manner throughout the plan and planning applications will be assessed against all relevant policies across the NSP to ensure integrated management of the urban environment.
Community led development and self-building should not be treated as a second best option	Support for self-build housing is provided by the self and custom build policy. Applications for

but preferred wherever it is capable of meeting other policy objectives.	community-led development would otherwise be assessed against the same policies as development proposed by other applicants and would not be treated discriminately. SP2 sets out the council's approach to working with and supporting communities.
Council-owned estates should be afforded greater protection as heritage assets in many cases and should not be viewed as development opportunities. Where infill development is a possibility it should be considered for its potential to create additional housing only of exemplary design whilst improving the condition or setting of the existing estate architecture.	Applications for housing estate regeneration schemes will be assessed against policies throughout the NSP including design and heritage policies to ensure that high standards of design are met and heritage assets are protected. Conservation policy protects unlisted heritage assets, including Second World War Stretcher Fences, which are a feature of some Southwark estates.
Respondent considers that no evidence has been provided to indicate why live-work units are no longer suitable and why strictly employment uses or conventional housing should be prioritised instead.	Live-work units are difficult to control – i.e. to ensure they are not being used wholly for residential purposes. There are several examples of live/work units reverting to conventional residential after they are built. Live/work units do not trigger affordable housing requirements and the borough has an acute need for affordable housing. Live/work units are not subject to the same rigorous standards of design as conventional dwellings and the Council is committed to ensure all homes are of a high quality.
SHLAA	
Recommendation to note that the Old Kent Road Opportunity Area had not been identified at the time of carrying out the SHLAA, therefore the SHLAA and the resultant minimum targets do not reflect the full potential development capacity of the Old Kent Road Opportunity Area.	The estimated development capacity for the Old Kent Road has been set out in the draft Old Kent Road Area Action Plan.
To ensure general conformity with London Plan policy 3.3, respondent recommends showing in the Local Plan, a housing trajectory and/or supporting evidence that seeks to identify and bring forward extra housing capacity, above the minimum housing target set out in Table 3.1 of the London Plan. This should comprise a pro-active and targeted re-appraisal of a borough's SHLAA findings, drawing on scenario tests, supplemented by more local sensitivity testing.	The NSP effectively seeks to augment the London Plan target by identifying site allocations, requiring the optimisation of housing delivery, supporting high density development, facilitating infrastructure provision to underpin delivery and supporting the transition of industrial land to mixed use neighbourhoods including housing.

SP2 Revitalised neighbourhoods

Comment Summary	Council Response Summary
Inclusivity	
Respondent suggests that the objectives of this strategic policy could be reinforced by further policies that emphasise inclusion and protection of vulnerable communities and businesses so they are protected against the impacts of regeneration such as rising rents and costs of living which can lead to displacement.	Policy has been updated in the PSV to emphasise the council's social regeneration agenda to ensure that existing residents can access the benefits of regeneration. The NSP include policies to secure affordable housing, small business space and small shops to protect against displacement of residents and businesses.

<p>The policy should be more explicit in relation to social inclusion of local communities in regeneration programmes.</p>	<p>Policy has been updated in the PSV to state that inclusion will be sorted as early as possible in the planning process as well as when decisions are made and that targeted support will be provided particularly for the disadvantaged.</p>
<p>Respondent considers that the Council has presented no evidence that its regeneration programme to “revitalise neighbourhoods” benefits existing residents and businesses. Community based evidence suggests that living in regeneration areas in Southwark has overwhelmingly negative effects. Before we commit to another 20 year Plan on this same old model, there should be a comprehensive documentation, review and assessment of the impact of Regeneration Areas on Southwark’s development. This would balance economic, social, and environmental factors, and have regard to health and equality indicators.</p>	<p>The strategic policy sets the objective of revitalising neighbourhoods to benefit existing residents and businesses. This will be achieved by policies throughout the NSP, which draw on an evidence base that has been published with each stage of consultation on the plan as well as evidence provided by respondents to consultation.</p>
<p>Transport management:</p>	
<p>Suggestion to consider bolstering the references to transport in these strategic policies, particular SP2 (revitalised neighbourhoods) and SP4 (strong local economy); this would support approvals and funding for future transport improvements in the borough and would give further strategic policy support for site specific transport improvements associated with new development.</p>	<p>Transport infrastructure projects are given support by specific policy. The strategic objectives for transport are set in SP6.</p>
<p>General amendments to policy text:</p>	
<p>The policy should directly mention London Bridge as an area of change rather than ‘along the River Thames’ – this is not place specific compared to London Bridge which is a recognised location as a Business Improvement District and accordingly has a special neighbourhood planning status.</p>	<p>The NSP has been updated giving specific guidance for London Bridge in its area vision.</p>
<p>The policy should acknowledge the collective engagement required to revitalise neighbourhoods. Rather than phrases such as ‘we will...’ which suggest Southwark Council’s efforts in isolation, the policy wording should also make reference to collective working with public and voluntary agencies, businesses and residents, striving towards finding Integrated Urban Management (IUM) solutions.</p>	<p>Policy has been updated in the PSV to indicate that support for communities in engagement will involve working with all council services, partners and community-based activities.</p>
<p>The adopted Core Strategy explicitly identifies Blackfriars Road as a location for tall buildings. Respondent recommends that the NSP should include a reference to this emerging cluster to consolidate this aspiration.</p>	<p>The NSP has been updated giving specific guidance for Blackfriars Road in its area vision.</p>
<p>Public Participation:</p>	
<p>To ensure the promise of a new ‘diversity standard’ is successful the highest standards of public participation should be expected, including early and full public information and consultation prior to their designation and effective participation early in the planning process. If the intention of the policy is to support the participation of hard-to-reach or under-represented groups then these groups should be directly identified in the policy wording to allow for effective monitoring.</p>	<p>Policy has been updated in the PSV to state that inclusion will be sorted as early as possible in the planning process as well as when decisions are made and that targeted support will be provided particularly for the disadvantaged.</p> <p>The Authority Monitoring Report will be used to track social regeneration and provide the opportunity to identify under-represented groups and progress in their engagement.</p>

SP3 Best start in life

Comment Summary	Council Response Summary
One respondent has commented that some of the commitments made by this policy would not be secured by planning policy, such as providing free fruit for primary school children.	The strategic policies reflect the Fairer Future promises in the Council Plan, demonstrating how planning and regeneration will contribute to wider council goals. The free fruit programme has now been rolled out.
Play Space:	
Recommendation to carry out a play space review across the borough to identify areas where children cannot easily access good quality play space or where the play space provided is inadequate the number of children using it. Provisions should be made within the NSP to identify sites which could provide new play space facilities or extend/upgrade existing facilities where there is a noted deficiency.	Play space was reviewed as part of the evidence base for the council's Open Space Strategy 2013. Play space is required by design policy in the NSP. Site allocations secure new open space where there are strategic opportunities and these spaces could also accommodate neighbourhood level play space or youth provision.
Respondent considers that there is a noticeable lack of reference to the need for quality outdoor play space elsewhere in the plan. To highlight the importance and secure its provision, play space requirements should be reiterated in other policies, especially in relation to policies relating to the permissions for housing developments.	Play space is required by design policy in the NSP. Site allocations secure new open space where there are strategic opportunities and these

SP4 Strong local economy

Comment Summary	Council Response Summary
Delivery Target:	
Representation considers the target to deliver 500 new affordable business units across the borough very low if this figure refers to the entire plan period and suggests it would be useful to know the locations/sites where it is anticipated these units will be delivered.	The target for 500 new affordable business units is set by the Fairer Future promises in the Council Plan. Progress against the promise and the strategy to meet it have been published in reports to the council's cabinet.
Respondent recommends amending the commitment of 500 affordable business units to be changed to '500 affordable business units and independent shops' to allow more flexibility to secure a diverse local economy and retail offer.	The target for 500 new affordable business units is set by the Fairer Future promises in the Council Plan. The NSP also supports small shops.
Tall buildings:	
Proposals to encourage a concentration of tall buildings in Peckham core area would be incongruous to the areas character and are not compatible with preserving the nature and character of the place.	This policy does not deal with tall buildings but rather refers to Peckham's role as a town centre. Tall buildings policy as well guidance in the Peckham area vision and site allocations will be used to assess applications for tall buildings. Examination of the Peckham and Nunhead Area Action Plan established that a tall building of up to 20 storeys could be appropriate on the Aylesham Centre site.
General amendments to policy text:	
Suggestion to include a reference here and in DM26 which recognises the contribution of	NSP policies provide for protection of small business space and small shops. The council

migrant and ethnic businesses (MEBs) make to the UK economy and Southwark's local economy. This should also include mention of the protection of existing SMEs within the boundaries of development proposals.	recognises the contribution of its diverse communities to the economic wellbeing of the borough and policy 'SP2: Social regeneration to revitalise neighbourhoods' sets the objectives to ensure these communities can access the benefits of regeneration.
Recommendation to list and identify CAZ, SCAs and Business Improvement Districts on the Figure 1 map.	The figure has been removed from the PSV. Policy designations will be shown on the policies map but Business Improvement Districts are not a planning designation.
It is suggested that the area in the vicinity of Bermondsey Tube Station represents the logical Action Area Core of the proposed New Bermondsey Action Area, particularly given the proposed redevelopment of the sites to the south of the tube station which will complement and enhance the existing Workspace SME and creative industries cluster and the Blue Local Centre.	The Bermondsey Action Area is no longer proposed in the PSV. A site allocation has been added for the Biscuit Factory site south of the tube station.

SP5 Healthy, active lives

Comment Summary	Council Response Summary
The respondent considers that the policy has considerable synergy with Sport England and Public Health England's recently launched revised guidance 'Active Design' – it may therefore be useful to provide cross-reference and/or a link to this guidance. The principles of Active Design should be further embedded in subsequent NSP policies; specifically Policy DM9: Design of Places and DM38: Healthy Developments.	The support for active design principles is noted. The requirement in the strategic and design policy will allow planning applications to be assessed against active design guidance without further cross-reference.
Any loss of sports provisions should be incorporated into formal policies such that it may be considered through the policy making process and scrutinised at Examination in Public.	The loss of sports facilities is restricted by healthy development, community uses and leisure, arts and culture policies. Site allocations set out the key opportunity sites for development which do not involve the loss of sports facilities.
The policy does not make any reference to planning for healthcare facilities such as medical centres, care homes and hospitals. A paragraph should be added setting out the Council's approach to identifying space for new health facilities and for delivering this infrastructure.	The policy refers to improving access to healthcare facilities. The council have been working closely with NHS Southwark Clinical Commissioning Group to deliver a strategy for new healthcare facilities. The needed healthcare facilities are secured by site allocations.
Recommendation to include a reference to the world class education and medical facilities at Guy's Hospital and King's College.	Reference to the university and hospital have been added in the London Bridge area vision and a site allocation.
The low-line could be mentioned as it will be delivering a green walking route.	The low line receives support from a specific policy and further support has been incorporated in area visions and site allocations.
Include a reference to working with public and voluntary agencies, business agencies and business improvement districts, in addition to residents.	The policy indicates that we will work with our partners which could include public and voluntary agencies, business agencies and business improvement districts.

<p>Strategic Policies 5 and 6 should be modified to reflect a better balance between promoting active transport modes in addition to improving the highway experience for other road users, notably bus passengers, emergency services, delivery services and other motorised services to local residents and the local economy. Respondent suggests including a reference to public transport provision is particularly important given it is a key contributor to the objective of healthy, independent, active lives, and specifically seeking to discourage car use, which conflicts with the health objective.</p>	<p>The reference to active travel in this policy emphasises those forms of transport that can significantly improve levels of exercise to achieve better health.</p> <p>SP6 already makes reference to the importance of public transport provision.</p>
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SP6 Cleaner, greener, safer

Comment Summary	Council Response Summary
<p>Transport management: Respondent recommends including a commitment to adopt policies for traffic management to improve air quality, such as enforcement of vehicle emissions standards, and traffic restraint policies.</p>	<p>These traffic management suggestions fall outside of planning controls and may fall outside of the other powers of the council.</p>
<p>The improvement of the Thames River Path and use of river buses should be promoted as these will aid the objectives for improving the natural environment and improving air quality.</p>	<p>The Thames Path and river transport receive support from other policies and further support has been added in a revisions and site allocations along the river.</p>
<p>Suggests the policy should provide support to the development of zero-emission refuelling infrastructure and promote zero-emission vehicles.</p>	<p>Support for zero-emission private transport is not given as a strategic objective because it would contribute to traffic congestions and indirectly to noise, poor air quality and climate emissions.</p> <p>Requirements for electric vehicle infrastructure are provided in the car parking policy.</p>
<p>Recommendation to explore innovative solutions for reducing congestion such as reallocating road space away from all private motor traffic during the daytime, to encourage freight and servicing consolidation.</p>	<p>The council works with TfL and other partners to innovate through transport projects to reduce congestion as well as improving air quality and encouraging active travel. The policy sets strategic objectives that these projects could help to meet.</p>
<p>General amendments to policy text: Respondent suggests the inclusion of monitoring process details, for example through green infrastructure and bio-diversity audits with target setting applied to measure the success of initiatives.</p>	<p>Plan monitoring targets are set out in an annex.</p> <p>Borough-wide the council has assembled a baseline of green infrastructure evidence which could be used for regular monitoring or in a review of the plan in addition to the Greenspace Information for Greater London resource. This includes the open space strategy evidence base, a review of all Sites of Importance for Nature Conservation and mapping of all of Southwark's trees.</p>

	Green infrastructure audits have been carried out for parts of the borough led by business improvement districts. Further green infrastructure audits may provide useful guidance for developers in order to meet the requirements of the green infrastructure policy. These could be carried out in support of the plan in the future.
Suggestion to include a reference to working with public and voluntary agencies, business agencies and business improvement districts, in addition to residents.	The council will engage with stakeholders as set out in the Statement of Community Involvement and in line with regulations. Elsewhere the NSP sets out that we will work with a range of partners in addition to local residents. This has not been repeated in this policy.
The policy needs to make reference to air quality and how it will tackle air pollution. New schools, hospitals or care homes should not be built in air pollution hotspots and existing schools near busy roads should be fitted with effective air filtration systems as recommended by the House of Commons Environmental Audit Committee.	The policy already makes reference to air quality. Further detail is provided by the air quality policy.

SP7 Social Regeneration

This policy has been combined with SP2 in the PSV in a new strategic policy SP2: Social regeneration to revitalise neighbourhoods

Comment Summary	Council Response Summary
<p>General comments:</p> <ul style="list-style-type: none"> - Many representations have welcomed the inclusion of this policy. - One respondent agrees with the principles of the policy but comments that the council needs to take a robust approach to implementing it. Several respondents have questioned how the policy will be delivered in practice and evaluated. - Respondent comments that while SP7 is a commendable attempt to better communicate with its constituents, the respondent considers that there is an apparent disconnect between the elected councillors/cabinet and council employees. - Respondent is concerned that this policy is at risk being undermined by other policies which threaten local residents and businesses with displacement and recommends that the council makes further efforts to work with existing communities to ensure development reflects their needs and desires. - Representation questions why only residents are specified in this policy and not workers or visitors. - Representation requests clarity on whether the term 'health centres' also includes Leisure centres. <p>Traffic/Transportation:</p> <ul style="list-style-type: none"> - Recommendation to emphasise the need to tackle motor vehicle pollution. 	<ul style="list-style-type: none"> - Noted. - Strategic policies will be implemented through the application of policies throughout the NSP. Monitoring will be published in the Authority Monitoring Report. The council is also consulting on monitoring as part of the Social Regeneration Framework. - Opinion noted. - Property prices have risen significantly across the UK and London. Policies in the NSP including those to deliver affordable housing and small and independent business space will help limit the displacement of residents and businesses. - The needs of workers and visitors are also considered in the strategic policies, in particular the strong local economy strategic policy. - Policy wording has been amended in the PSV, removing the reference to health centres but both health centres and leisure centres are supported by the NSP. - There is a separate cleaner, greener, safer strategic policy that deals with pollution.

<p>General amendments to policy text:</p> <ul style="list-style-type: none"> - Recommendation to add a reference to meeting needs in point 2. Suggested amendment to text is as follows: "Building new and improving existing community facilities to meet the needs of our residents, including schools..." This policy broadly aligns with the Department for Education's focus on improving social mobility." - Respondent recommends aligning future terminology of this policy to the language used in the social regeneration framework which has not yet been finalised. - Suggestion to amend point 6 to read: "Ensuring new development reduces avoidable harm to residents, such as air and noise pollution, and that crime and road danger are designed out, including the reducing fear of them occurring" to cover both harm and fear or risk. - Respondent agrees with this policy and believes that Camberwell will benefit from strengthened social cohesion but suggests that SP7 could additionally state that all development should be future proofed to facilitate future development within the immediate vicinity. - Respondent recommends the provision for non-self-contained housing that can adapt to changing lifestyles to support an ageing population as these are most at risk from loneliness and the adverse impacts of loneliness. - Recommendation to include additional text to this policy to ensure that evidence is provided alongside any major development in the Borough. Text suggestion is as follows: 'planning applications for major new developments should evidence how their application has contributed towards achieving this;' - Recommendation to strengthen the policy by providing for new employment and training, apprenticeships and other social benefits within all major developments; This approach would help to engage businesses and developers in delivering the social regeneration objectives of the plan. Policy should also embrace the opportunity of investment in culture. - Respondent suggests that the policy should emphasize on meeting social regeneration policies on site or within the immediate vicinity. - Respondent comments the council must ensure that policies do not result in negative effects and the local residents are at the centre of all regeneration. - Respondent questions the data used in point 2 and comments that it is a short list which excludes other important social infrastructure such as desks/police stations/ community police stations and green infrastructure. Respondent requests that a list of infrastructure needing improvements be included as the policy should extend to refurbishments as well and not limit to new developments. - Respondent would like clarification as to what the geographical extent of a 'local community' is. 	<ul style="list-style-type: none"> - Point 2 has been removed in the PSV but the education places policy has been amended to ensure that school places are provided when needed. - The Social Regeneration Framework is being prepared alongside the NSP. The NSP has been aligned with it. - Point 6 has been removed in the PSV but the combined strategic policy requires development to foster a sense of community alongside discouraging crime, covering both perceptions and risks. - The efficient use of land policy prevents development from compromising future development on neighbouring sites. - The quality affordable homes strategic policy supports the provision of all types of housing and the housing for older people policy gives specific support for specialist housing. - Evidence is required alongside planning applications as set out in the council's validation checklists. - The NSP contains policies to secure access to employment and training and supporting investment in culture. - The strategic policies set out the council's priorities for development. Detailed policies throughout the NSP relate specific requirements to the vicinity of development. - The policy has been amended in the PSV to emphasise benefits to existing residents. - Point 2 has been removed in the PSV. The NSP contains policies to secure social infrastructure and green infrastructure. - Policy has been amended in the PSV to remove the term local community from the policy wording; the emphasis is on residents of the borough.
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Development Management Policies Consultation Summaries

DM1 Affordable homes

Comment Summary	Council Response Summary
Affordable housing requirements:	
Affordable housing requirements should mirror the objectively assessed housing need (OAN). The OAN is for 48% of new housing to be affordable.	The PSV adds the objective to endeavour for 50% of all new housing to be affordable in the strategic policy. The 35% target is aimed at private development and is informed by viability testing. Council and housing association house building will provide a greater proportion of affordable housing towards the overall 50% target.
The policies should state that affordable housing requirements are subject to viability.	The policy is updated in the PSV to clarify that requirements are subject to viability. This is how the policy would be applied under national policy.
Affordable Rents should not be disallowed because they are acceptable in the London Plan which has primacy. Furthermore, Affordable Rent can secure grant funding (Mayor's Housing Covenant 2015-2018).	The most acute need in Southwark is for social rented housing. Extensive evidence has been prepared periodically in the Southwark Affordable Rent Study indicating that significant reductions to market rents are required to make housing affordable to Southwark residents.
There needs to be encouragement of alternative forms of lower cost/affordable housing such as homes for key workers. More imaginative ways of achieving intermediate affordable housings should be embraced in the plan such as community land trusts	An affordable housing fact box has been added in the PSV, indicating that there are a range of intermediate tenures including community land trust housing.
The respondent considers that the policy has insufficient emphasis on the need to foster mixed/sustainable communities by providing affordable housing on site. Policy needs to explain how the test will be applied which allows for off-site contributions or payments in lieu. There should be more emphasis on off-site provision as there is a risk there will be no suitable or available sites where in lieu payments are accepted. The off-site provisions should be in the vicinity of the main development.	The policy has been amended in the PSV to clarify the preference for provision on-site before off-site, and for either before accepting an in-lieu payment. The location of off-site provision or council house building would be assessed against policies throughout the NSP to ensure it is suitable.
Respondent recommends the undertaking of further research and justification for moving from the in lieu tariff contribution to the opportunity cost method to ensure that this would not raise less. The calculation will need to take into consideration the availability of funding for certain products and development viability.	The Council has commissioned a strategic viability study to identify the level of affordable housing contributions that should be required on residential schemes. The study recommended an approach to in-lieu contributions that is cost neutral. This is the approach set out in the PSV.
Affordable housing policies should take account of emerging imperatives in the Housing and Planning Act.	The plan is considered to be in conformity with the Housing and Planning Act 2016. Government has not produced the regulations to require starter homes and the government white paper Fixing Our Broken Housing Market 2017 indicated a change in direction for national policy.

Amended Policy DM1: Affordable Homes

Comment Summary	Council Response Summary
<ul style="list-style-type: none"> - Suggests housing for the poorest should be a priority. - Would like to see more housing for essential workers as well. - Suggests that the affordable housing target should be 40%. Concerned amended policy DM1 does not reflect the approach of the GLA in the recently adopted affordable housing SPG. - Concerned the policy does not reflect the GLA's approach. Suggests that for clarity and consistency the policy should reflect the thresholds for the requirement of viability reports as per the SPG, including that schemes which exceed the 35% provision (50% on public land) are not required to be supported by viability appraisal. - Suggests a 50% affordable housing target should be set across the borough. - Suggests that intermediate housing should not be considered affordable. Suggests that intermediate housing should include community land trusts. - Concerned that the Council's approach will impact the delivery of intermediate housing. Suggests DM1 should be amended to allow a different tenure mix to be applied to the provision of affordable housing within Regeneration Areas; where affordable housing requirements have been set by an Area Action Plan. - Suggests the Draft policy DM1 does not align with the SPG's preferred tenure split. - Suggests the apparent exclusion of affordable rent and London affordable rent tenures and the minimum requirement of 25% social rented housing does not offer sufficient flexibility to maximise affordable housing outcomes for individual sites in accordance with Local Plan policy. This approach also risks the ability of schemes to secure grant funding under the Mayor's Housing Covenant 2015-18 programme, which requires use of the Affordable Rent tenure. As such, the policy may reduce the amount of affordable housing which can be brought forward in the borough, requiring developers to revert to viability submissions where otherwise this may not have been necessary. We therefore 	<ul style="list-style-type: none"> - Policy prioritises social housing, which is the most suitable tenure for the worst off. - A range of affordable tenures will assist essential workers to access housing. - The affordable target has been set at a viable level in line with viability testing. The strategic quality affordable homes policy has been amended in the PSV with the aspiration to deliver 50% affordable homes across the borough. - Policy has been amended in the PSV removing the reference to viability appraisals, which will be required when appropriate in support of planning applications, in line with planning guidance. - The strategic quality affordable homes policy has been amended in the PSV with the aspiration to deliver 50% affordable homes across the borough. - National planning policy established that affordable housing includes intermediate tenures. Community land trusts are listed in the accompanying fact box. - The tenures required by the policy reflect the council's strategy for affordable housing. Area Action Plans form part of the development plan and if appropriate could set different affordable housing requirements. - The tenure split in the policy has been set to reflect the council's strategy for affordable housing with reference to local evidence. - The policy is in conformity with the London Plan. The Council may apply the policy flexibly where viability is an issue on a specific scheme (as required by national policy). The approach does not risk the ability of schemes to secure grant funding from the Mayor. The Housing Covenant states that homes charging rents lower than London Affordable Rent are eligible for grant funding.

<p>suggest that the policy is re-worded to allow the provision of other social housing products in line with the definition of social housing in the supporting fact box, which includes social rent, affordable rent and London affordable rent.</p> <ul style="list-style-type: none"> - Suggests improving the prospects of also achieving a 70:30 tenure split, the potential for greater building heights and densities should be supported where appropriate, as well as flexibility on unit sizes and mix. Indeed, this approach is supported by the Mayor's SPG. - Draft Policy DM1 seeks a minimum provision of 35% affordable homes with a 70:30 split between social rent and intermediate tenures, subject to viability. A rigid requirement for these tenure splits has the potential to impact on scheme viability, and subsequently reduce the overall headline amount of affordable homes that may be deliverable. It is considered that a flexible approach to the split should be advocated, based upon site-specific circumstances. - Suggests text supporting affordable housing requirements, detailed in 1.1, and has been removed. Although the requirement is given in Table 1.1 the text gives it additional weight and should be restored. The method for calculating the affordable housing requirement has been removed. The method determines the quantum of affordable housing a development will deliver and should be included in the NSP text. Of the three measures used for this calculation - by unit, by habitable room, by gross internal area - the last is the most accurate. Suggests restoring previous text - 'The affordable housing requirement will be calculated on a per sqm basis of the entire Gross Internal Area of the building used as dwellings.' Suggests the inclusion of the box detailing the affordable housing requirements for the Aylesbury Area Action Plan (1.2) is confusing. It appears that they are an alternative to the requirements of 1.1, and without any explicit statement that they would only apply to the Aylesbury AAP area could be interpreted as applying throughout Southwark (which is what we assume is not intended). It is also not clear why the Aylesbury AAP is included when there are other AAP/OAPF areas that are exceptions to 1.1. - The supporting text to Policy DM1 which allows for flexibility in applying these requirements is welcomed. - Supports the policy that the affordable housing component of build to rent schemes is provided as discounted market rent in accordance with Government Guidance and the GLA's SPG. Suggests that the headline figure of 35% and the tenure split / discount levels proposed cannot be delivered in tandem. Our modelling demonstrates a clear trade-off between headline unit numbers and depth of discount. Based on our analysis, the depth of discounts set out in the draft policy will result in a far lower headline number of 	<ul style="list-style-type: none"> - The NSP contains policies for managing tall buildings, recognising their benefits, and optimising the delivery of new homes. - The affordable target has been set at a viable level in line with viability testing. The policy will be applied flexibly where site specific circumstances make it impossible to deliver the tenure split without significantly compromising the viability of the development. This must be robustly justified. - The table of affordable homes requirement forms part of the policy text and will be given due weight. <p>Policy has been amended in the PSV requiring the requirement to be calculated by habitable rooms, which is aligned with the London Plan and will achieve a consistent level of affordable housing between schemes.</p> <p>Policy has been amended to refer to the Aylesbury AAP for the requirement in that area.</p> <ul style="list-style-type: none"> - Noted. - Support noted. <p>The policy for private homes specifically states that the requirement will be subject to viability. The policy will be applied flexibly to ensure the best balance between the tenure split and overall quantum of affordable housing provided.</p>
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<p>discounted market rent homes delivered by commercial development. Suggests it is not realistic to seek the headline 35% provision and the split depths of discount prescribed in the draft policy.</p> <ul style="list-style-type: none"> - Suggests that any proposed student housing scheme should be submitted and considered as a Build to Rent or a Private Rental Homes scheme or a Collective Living scheme with, subject to viability, up to 35% being provided at less than the open market rent and be capable of being occupied by students and Key Workers of a Further or Higher Educational or Health Provider organisation. All schemes would provide adequate living space using industry and occupier accepted space standards for student en suite cluster rooms with communal kitchens and common rooms and studio rooms, which both King' College and Guy' and St Thomas Hospital confirm is acceptable for our mainly single Key Workers. - Suggests the threshold for triggering an obligation to provide affordable housing should be kept at 10 homes. - Suggests a 50/50 balance of shared ownership homes and affordable rent should be maintained as set out in the adopted planning policy position. - The Preferred Options draft contained wording which allowed for exceptions to this split where requirements have been established through an Area Action Plan, it has noted that this has been removed from the New and Amended Preferred Option. Respondent would welcome further discussions with the Council to understand this change. - New emerging London Plan 2019 is well within the New Southwark Plan time frame and therefore I argue that the Mayor's long-term aim for half of all new homes to be affordable be written into the New Southwark Plan. - It should be noted that the evidence base associated with this policy demonstrates that there is an identified need for all tenures of affordable housing within Southwark, and we would suggest that a more flexible approach is taken, based on site specific circumstances. 	<ul style="list-style-type: none"> - The student homes policy has been amended for nominated student housing in the PSV to require affordable housing in line with the private rented homes policy. - The NSP endeavours to ensure 50% of all new homes overall are affordable, which requires all housing development to contribute where it would not be undermined. Policy has been amended in the PSV to specifically state that contributions from developments of 10 homes or less must be at a viable level. - Adopted policy in the Southwark Plan requires a tenure mix of 70:30 social rented: intermediate housing. - Area Action Plans form part of the development plan and if appropriate could set different affordable housing requirements. - The strategic quality affordable homes policy has been amended in the PSV with the aspiration to deliver 50% affordable homes across the borough. - The tenures required by the policy reflect the council's strategy for affordable housing. The policy will be applied flexibly where site specific circumstances make it impossible to deliver the tenure split without significantly compromising the viability of the development. This must be robustly justified.
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DM2 New family homes

Comment Summary	Council Response Summary
Recommendation to amend the policy to be less prescriptive and allow for alternative housing mixes where adequate justification is given. There may be design reasons why the	The policy would be applied flexibly when where design constraints would make compliance with housing mix impossible.

default housing mix is not deliverable.	
Respondent considers that larger units may be undesirable (unaffordable) in high value areas of the borough because there are fewer potential customers.	Lower sales rates among larger units might marginally affect the viability of schemes, however there is no evidence available that this is the case in high value areas in Southwark.
The policy should acknowledge that family homes may be unsuitable where there is no adequate outdoor children play space.	Family sized homes should provide a useable amount of private amenity space and play space. Development may contribute to improvements to off-site play space where this is not possible.

DM3 Protection of existing family homes

Comment Summary	Council Response Summary
Respondent has suggested that the policy is likely to restrict intensification of areas of the borough which are currently less dense. Particularly the south of the borough.	The character of the south of the borough is more suitable for family homes and there are fewer opportunities for infrastructure to support intensification.

DM4 Private rented homes

Comment Summary	Council Response Summary
Requirement for three year tenancies should make clear that tenants have the opportunity to break the tenancy after six months, as would be the case for one year tenancies. The policy should indicate the period after which no penalty would be incurred for early termination of tenancy. Respondents have recommended that there should be flexibility for longer and shorter tenancies if requested by the tenants	Policy is amended in the PSV to introduce a six month break clause in the tenant's favour, giving greater flexibility in favour of tenants with the opportunity to exit early with no penalty.
Recommendation that the covenant periods should be reduced from 30 years to 15 years	In order to justify the support given to purpose built private rented homes the benefits of build to rent (providing well managed private rented housing) must be secured. An incentive is therefore essential to keep this housing in the private rented sector. 30 years is considered to be an effective period within which to apply a covenant to ensure that applications for purpose built private rented homes are submitted with the intention of managing the housing effectively and not converting it to for sale housing. This should not present a problem for legitimate providers who would not generally have any need trigger the clawback. It should be noted that the clawback, if triggered, is not punitive. The clawback ensures that there is no financial incentive to 'flip' from a build to rent development (which is what would have been granted planning permission) to a built for sale development. This is necessary because build to rent and built for sale homes have the

	<p>same use class.</p> <p>The policy could be applied flexibly to allow shorter covenants if fully justified and this will be dependent upon viability.</p>
Request to provide more overt recognition that the affordable housing requirement from DM1 may not viably be applied in the same way as it would for conventional market housing schemes.	Policy is amended in PSV to offer an alternative model of affordable housing contribution at a level that equalises viability with built for sale housing.

Amended Policy DM4: Private Rented Homes

Comment Summary	Council Response Summary
<ul style="list-style-type: none"> - Respondents suggest there is confusion as to the definition of the phrase, "in perpetuity" and that it is contradictory to the 30 year penalty period. - Suggests longer tenancies and a longer time for the property to be rented. 30 years is not very long and will not provide much needed regulated private rented housing in the long term. - The minimum tenancy should also be increased to 5 years to reflect the fact that the PRS is becoming more of a mainstream tenure and more families are using the sector. - Suggests 5% of all homes delivered to be minimum 3-bed HMO properties, with individual room rents to be no more than 100% of the Local Housing Allowance Shared Accommodation Rate. - Currently, young people on low-incomes and requiring support for housing costs suffer from a lack of affordable options in the PRS. The Council could work with the PRS to provide this accommodation alongside educational and training support. - Suggests the phrase 'subject to viability' should be removed and the Council should be clear that any development must reflect the Council's ambition to deliver genuinely affordable housing. - Suggests that the flexible approach to affordable housing would be suitable for all housing products within opportunity areas. - Supports the ability to bring forward private rented schemes in Southwark, and for discount market rent as the affordable housing offer. This would adhere to the Mayor's SPG which recognises the important role being played by the private rented sector in 	<ul style="list-style-type: none"> - Policy has been amended in the PSV to clarify wording. - 30 years is considered to be an effective period within which to apply a covenant to ensure that applications for purpose built private rented homes are submitted with the intention of managing the housing effectively and not converting it to for sale housing. This will encourage legitimate providers who intend to keep the housing within the private rented sector for much longer than 30 years. - It is considered that the policy requirement for a minimum tenancy period of 3 years will significantly improve the security of tenure for renters who would typically have to accept a tenancy of 1 year in the private rented sector. - The policy requires that the mix of housing sizes reflect needs for rented property. It is not clear what the basis for 5% 3-bed target would be, the rate for conventional housing is higher at 20-30%. - Noted. The NSP secures jobs and training opportunities for local people and sufficient educational places in other policies. - Policy has been amended in the PSV to ensure that affordable housing is required to the point that the scheme value is the same as for sale housing. - Housing in opportunity areas could be delivered as either for sale or private rented housing and the appropriate affordable housing approach would apply. - Support noted. It is considered that the policy provides the flexibility required to bring forward viable private rented housing developments.

<p>meeting housing needs across London. Suggests a flexible approach is required overall to ensure that schemes remain viable and deliverable.</p> <ul style="list-style-type: none"> - Suggests that unlike policy DM1 there is no reference to a flexible approach being applied to the mix targets included within the supporting text and we request this is included. - With respect to the minimum 30 year term over which the private rented homes are to be secured (DM4.5) suggests this appears excessive and double the minimum 15 year term recommended by the GLA in their recently adopted SPG, and Central Government guidance. We would recommend that this remains at 15 years for consistency. - Suggests the requirements for Private Rented Homes as set out at Policy DM4 of the New Southwark Plan do not reflect the Mayor of London's definition of Build to Rent as set out within the Mayor of London's Affordable Housing and Viability SPG. - Policy suggests that build to rent schemes of less than 100 units would not be supported. There appears to be no evidence to support this scale threshold. It is considered that a lower threshold of 50 units would reflect the commercial market's expectations at this time. This would also accord with the Mayor's SPG definition (Paragraph 4.9). - Sub-section 2 refers to professional on-site management. The sub-section should clarify that management should not necessarily mean full-time dedicated 24hr on-site staff; this is a matter that will be determined by the market on a site specific basis. Again this would accord with the Mayor's SPG definition. - Suggests that the table should reflect an affordable rent for household incomes up to £60,000 in line with the current London Plan AMR. 	<ul style="list-style-type: none"> - It is considered that the policy provides the flexibility required to bring forward viable private rented housing developments. - The overall approach in the NSP is considered to be aligned with that of the Mayor of London. 30 years is considered to be an effective period within which to apply a covenant to ensure that applications for purpose built private rented homes are submitted with the intention of managing the housing effectively and not converting it to for sale housing. This should not present a problem for legitimate providers who would not generally have any need to trigger any clawback. - The overall approach in the NSP is considered to be aligned with that of the Mayor of London. - The plan seeks a threshold that is suitable for purpose built development of high quality, professionally managed accommodation. The 100 unit threshold reflects market interest in the borough for this type of development as seen in planning applications and enquiries. - The policy seeks much higher standards of management than the often poor standards in the existing private rented sector. The detail of management arrangements will be considered when planning applications are assessed. - The table in the policy requires 18% of the housing to be affordable rent capped at London Living Rent equivalent which will be suitable for households with incomes up to £60,000.
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DMS Housing for older people

Comment Summary	Council Response Summary
<p>Recommendation to amend the policy to clarify how a 'comparable' level of alternative accommodation will be assessed and defined in circumstances where the loss of specialist provision is allowed</p>	<p>PSV amends policy to clarify that comparability will be based on number of bed-spaces, suitability of location and affordability of a accommodation.</p>
<p>The NSP should include a target for older people housing provision over the plan period and this should be based on evidence about projected future need. This could reference the London Plan benchmark</p>	<p>The Southwark Housing Strategy to 2043 aims to meet the needs of older people through building lifetime homes, delivering extra care housing, exploring other specialist housing options for older people, and adapting properties to enable older residents and people with disabilities to live independently as long as possible in their communities. As such the NSP</p>

	will not include a fixed target for specialist housing but the policy is clear that provision will be accepted where there is a demonstrated need.
The respondent considers that the policy should state features of older people accommodation which might be appropriate, such as shared facilities and communal rooms, space for on-site staff and accessibility requirements.	Policy amended in PSV to require adequate communal areas and space for on-site services and facilities.
Suggestion that the policy should note the distinct economics of providing homes for older people in requiring an affordable housing contribution. The requirement for AH provision in line with DM1 may not be suitable	Policy amended in PSV to accept alternative forms of affordable housing where this would not provide a financial benefit.
The policy should set out a proactive approach for how older people housing schemes will be brought forward.	The policy is pro-active in supporting development to meet the needs of older people.
Recommendation that greater flexibility should be shown regarding building density on small-scale developments of downsizing accommodation, as long as they achieve an exemplary standard of residential design.	Density ranges may be exceeded where development is of exemplary design.

DM6 Homes for households with specialist needs

Comment Summary	Council Response Summary
Policy should address the need to adapt existing homes to meet the needs of people with disabilities. This should be a weighted consideration when balanced against the interests of conservation areas and neighbours amenity.	Design and conservation policy can be applied flexibly where occupiers need to adapt their homes to ensure this is done in the most sympathetic way possible for neighbour's amenity and to protect the historic environment. Weight will be applied to competing considerations for a planning application by the decision makers.
Respondent regards the requirements for technical housing standards which exceed those set out in the London Plan not to be in conformity (space standards for wheelchair homes).	The NSP only requires wheelchair homes to exceed the minimum space standards. The minimum space standards do not apply to wheelchair homes. All other aspects of design which exceed the Building Regulations for wheelchair homes are recommended. They are not required. They are recommended as they have been proven to be successful. Electing to follow the recommended standards of design is beneficial to a developer as it enhances the saleability of wheelchair homes. Particularly affordable wheelchair homes which are sold to registered social landlords.
Policy should acknowledge that prescriptive standards can be set aside where innovative architecture demonstrates that design quality and functionality of space is not compromised in order to allow for greater flexibility in the design process.	The policy could be applied flexibly if innovative design were to demonstrate that in exceptional instances departure from the standards would achieve the same quality of accommodation.

DM7 Houses in multiple occupation and hostels

Comment Summary	Council Response Summary
Respondent considers that the policy does not set out the basis upon which demand for hostel accommodation will be assessed.	Hostels are a specialist form of accommodation for specific housing needs that will need to be considered on a case by case basis considering evidence provided by relevant public services.
Policies should clarify how 'overconcentration' will be determined.	Overconcentration will be dependent on the amenity impacts of the hostels in question and will need to be considered on a case by case basis.

DM8 Optimising delivery of new homes

Comment Summary	Council Response Summary
Respondent considers the habitable room definition is inadequate for studios which include kitchenettes, living rooms and bedrooms all within one 28sqm room. The purpose of the policy is to prevent oversized rooms, not to prevent studios.	The policy can be applied flexibly and density ranges can be exceeded with exemplary design. The purpose of the density calculation is not to prevent oversized rooms nor to prevent studios but to arrive at a comparable figure for the intensity of residential development. The number of studios provided will generally be restricted by the family homes policy, applications with a high proportion of studios increasing the density would be the exception.
The policies should allow higher densities in the south of the borough where there is currently under-development and the capacity to sustain more population.	The character of the south of the borough is more suitable for family homes and there are fewer opportunities for infrastructure to support intensification.
Allowance of 'over-dense' proposals may be mitigated individually for the residents of the scheme but this does not take account of the cumulative impact of such development.	Other policies in the NSP will be applied when assessing planning applications to ensure that their cumulative affect does not have an unacceptable impact on residential amenity.
Policies should acknowledge that some large sites within the urban and suburban density zones will be large enough to define their own character and through an appropriate plan led process could encourage higher densities.	It is noted that larger sites do present the opportunity to define their own character, although other considerations such as infrastructure capacity must be assessed. The policy will allow proposals to exceed density ranges with exemplary design. A plan-led process has resulted in the identification of large sites among the site allocations and design factors they must consider.

DM9 Design of places

Comment Summary	Council Response Summary
Protection of amenity/ outdoor spaces	
Introduce a mixed use consideration that ensures when new uses are being introduced they would not undermine the continuation of existing uses (e.g. Bussey Building or Ministry of Sound)	Other NSP policies for the efficient use of land, protection of amenity and management of noise can be applied to ensure that development does not undermine the operation of existing legitimate land uses.
Recommendation to include a policy which addresses estate infill and covers protection of greenspace, density, protection of amenity, tenure mix and rehousing residents.	Other NSP policies for green infrastructure, density, amenity and housing mix can be applied to estate regeneration schemes. The rehousing of existing residents is not contingent on planning permission and therefore would not be controlled by planning policy. The council has put in place other policy and procedures to protect the rights of tenants, including the Housing Strategy.
Policies should provide support for developments which build upon the existing benefits of council estate layouts and amenities.	The policy requires development to respond to existing character which would include the positive aspects of housing estates.
An additional point should support an ecosystem services approach to development which ensures it is appropriate to its setting, retaining trees and incorporates multifunctional green infrastructure and water sensitive urban design.	The policy supports green infrastructure along with other policies on open space, green infrastructure, trees and biodiversity. The emphasis on delivering, protecting and enhancing green infrastructure to benefit people encompasses an ecosystem services approach.
Improvements to the public realm:	
The policies should balance the needs of pedestrians and cyclists as against the levels of motorised vehicle traffic, with the aim of improving conditions for the former.	Other policies NSP for transport prioritise walking and cycling.
The policies should secure the provision of quality outdoor play space for children where family homes are provided.	Support for play space requirement noted.
Street clutter should be avoided, e.g. through incorporating street lighting into the fabric of the building/development.	Support for the avoiding of street clutter noted.
Bankside benefits from variety in scale, age, heights and frontage depth of buildings and their facades is a positive characteristic and the change and mix in scale in buildings and public spaces is intrinsic to the area. The proposed policy does not allow either for recognition nor safeguarding.	The policy requires development to respond to existing character which could include architectural features of a neighbourhood.
The definition of contextual landscaping should be explained and expanded to promote multifunctional green infrastructure and water sensitive urban design in the development, retaining trees and other existing natural assets.	Policy re-worded in PSV to clarify that landscape should be appropriate to the context and green infrastructure is emphasised in a separate policy.
Add explicit reference to providing adequate outdoor seating (Age friendly borough)	Policy amended in PSV to require outdoor seating as part of creating an age friendly borough.
Recommendation to make the public realm more permeable for sustainable modes other than private motor traffic, so as to give these modes a competitive advantage. The NSP should provide more detailed guidance in this regard.	Other policies NSP for transport prioritise walking and cycling; however as a general design principle permeability is desirable.
It is suggested that this policy includes guidance which promotes contemporary, high quality architecture and progressive urban design. This should recognise how innovative architecture	Innovative design is supported by the design quality policy, the plan does not specify that contemporary building styles will be preferred or otherwise as long as the design is

can be positively incorporated into existing places while maintaining the high expectations for design.	successful.
General amendments to policy text:	
A number of representations called for the language in this policy to be tightened to clarify whether some or all of the points should be addressed by development and change 'should' to 'must' where this occurs to provide certainty.	Wording amended in PSV to 'development must'.
The policy should include reference to leisure use in addition to formal and informal play.	All neighbourhoods in the borough are anticipated to provide new homes, which must be supported by adequate play space. The NSP supports leisure facility provision but new leisure facilities will not be required from most proposals to achieve effective place making.
The policy wordings should include an 'and' at the end of clause 7 to indicate that all clauses are required.	Wording amended in PSV.
The policy should ensure urban grain and site layout of development proposals reflect existing patterns of development and movement, permeability and street widths.	Policy requires development to respond to existing character.
Policy should provide support to development which 'better reveals local distinctiveness and architectural character'. This is particularly important in Bankside where the small and tactile character of the area include the eclectic mix and diversity both of buildings and the activities they attract.	Policy requires development to respond to existing character.
The policy should make provisions to ensure development proposals consider and mitigate against the potential adverse impacts on wind.	Protection from microclimate impacts including wind are provided by other NSP policies for tall buildings and the protection of amenity.
The policy should promote Health Impact Assessments (HIA) as a useful tool to assess and mitigate against the impacts of development proposals, as supported by the National Planning Policy Guidance and the London Plan (Policy 3.2).	Healthy developments are required by other NSP policy and the council will update the validation requirements for planning applications to indicate where this should be demonstrated by a health impact assessment.
There is no need to have multiple general design policies. DM9 and DM10s should be combined so that the principles of 'good design' can be more clearly spelt out. Neither of the current policies takes into account historic natural/ built assets nor provides a mechanism for a decision mechanism that is particular to Southwark.	Design criteria from both policies will be considered when assessing planning applications in a similar mechanism to other policies. The design of places policy covers criteria that are more concerned with places overall rather than the design of individual buildings.
The first clause should make reference to Policy DM8 which allows for higher densities of development where improvements to infrastructure are occurring.	Both policies will be applied to assess planning applications without need for cross reference.
For clarity purposes, point 8s should confirm that play and informal recreation should be provided 'for development proposals that include housing'.	Opportunities for play will be considered a characteristic of a successful place and could be incorporated into external areas of other developments aside from housing. The London Plan specific requirements for play space will still only apply to housing. The policy can be applied flexibly where opportunities for play would not be feasible.
Text should be provided within the supporting Policy text to explain briefly what is meant by "the principles of water sensitive urban design". It is not clear what design opportunities are being sought here.	A definition of water sensitive urban design has been added to the NSP glossary in the PSV.
The policy should be adjusted to support locational factors and regeneration in area action plans.	Area Action Plans also form part of the development plan and any policies will be considered when planning applications are assessed.

DM10 Design quality

Comment Summary	Council Response Summary
Impact of development on amenity:	
refers to daylight, sunlight and outlook but is not clear what this covers i.e. does it cover impacts on occupiers of development, impacts on occupiers of nearby buildings and impacts on nearby parks and open spaces?	Wording clarified in PSV.
The introduction of performance standards for sunlight and daylight into a policy in the NSP may be worth considering given that the widely used BRE guidance on site layout planning is guidance only and recent research has emphasised the importance of sunlight and daylight access for health and wellbeing. This could include consideration of setting differential standards for certain types of area/development. For example, higher sunlight and daylight standards may be justified for public spaces in high density urban areas (e.g. new spaces in Old Kent Road OA) where they will be important amenity spaces for large numbers of people year round.	The policy requires adequate daylight and sunlight along with the residential design quality policy. Performance standards in guidance and other evidence can be applied to determine whether a planning application complies with the policy.
General suggestions of policy amendments:	
Policy wordings should include the use of 'only' with regard to where planning permission will be granted to make the requirements stronger in their position.	Policy wording amended in PSV to 'development must provide'.
Point 1 should also make reference to appropriate scale as this is a really important aspect of how well proposals fit in the local context.	Scale is brought into consideration by the design of places policy, which will be applied alongside this policy to assess design.
Basements item 10 should confirm that basements should only be allowed if they do not adversely impact on neighbouring properties in any way.	The policy protects amenity, which would protect against adverse impacts to neighbours.
A new point is needed to say that design should be adaptable to ensure a development's longevity.	Policies in the NSP will ensure a standard of design and sustainability which should generally make new buildings and spaces more attractive to be re-used in the future. However, Planning applications will be assessed on the basis of the land use proposed and as such there would be little basis to further consider their adaptability for other uses.
On-street servicing:	
Point 8 should be amended to acknowledge that on-street servicing can be acceptable and appropriate in certain circumstances, particularly where there are constraints that limit the site. In exceptional circumstances, on-street servicing should be allowed on existing public highways subject to ensuring no adverse impacts on the safety of pedestrians, cyclists and other users.	Limiting on-street servicing will help to deliver the council's Kerbside Strategy. Policy can be applied flexibly in exceptional circumstances where it is not possible to accommodate servicing on site.
The policy promotes adequate servicing within the footprint of buildings and sites; however this is not always possible in highly constrained areas. This policy is also slightly contradictory to policy DM 43 which requires such off-street servicing for 'large development sites'. You could therefore consider giving clear guidance where on-site servicing is not possible e.g. that a planning permission will only be granted where suitable existing on-street facilities are	Limiting on-street servicing will help to deliver the council's Kerbside Strategy. Policy can be applied flexibly in exceptional circumstances where it is not possible to accommodate servicing on site.

available.	
Tall buildings:	
An additional policy should promote and provide guidance for design review panels for tall buildings, major developments and schemes at the highest density (650-1100 hr/ha) at the pre application stage. These panels should be paid for at the expense of the scheme promoter and be open to members of the public. Representatives from the panel should also be invited to comment at planning committee in addition to a BID representative where the proposed scheme is within a BID area.	Design review panels are used by the council when needed to assess development proposals. This does not need to be set out in policy.

DM11 Residential design

Comment Summary	Council Response Summary
Include guidance on basement development	Requirements for basements are provided by the design quality policy.
Add a requirement that where a scheme is being built on what was a publicly accessible open space the majority of ground floor open spaces should be publicly accessible?	Other policies in the NSP protect open space where this has met the criteria for designation on the policies map.
The respondent considers the Council has not justified why the policy seeks to promote the minimum ceiling of 2.5m for at least 75% of a dwelling when National Technical Standards cover this issue and states that a minimum height of 2.3m for at least 75% of a dwelling is required. It is neither clear as to what the outcome would be if developers did not chose to meet this requirement.	The policy does not require development to exceed the minimum ceiling height. However, ceilings higher than the 'minimum' are encouraged as they provide superior air flow and improved light.
General amendments to policy:	
Policy wordings should include the use of 'only' with regard to where planning permission will be granted to make the requirements stronger in their position.	Policy wording amended in PV to 'development must'.
The space standards provided in tables 5 and 6 need an explanation of what the figures are.	The columns of the tables are labelled and they are referred to in the policy.
Flexibility in design standards of Build to Rent schemes should be reflected in the wording for this policy and Policy DM4 to ensure the Council's objectives of delivering thousands of new homes (including affordable homes) in areas such as the Old Kent Road can be achieved.	The council considers that build to rent housing should meet the same design standards as that built for sale to benefit the health and wellbeing of all residents.
The absolute prohibition on single aspect north facing dwellings and single aspect three bedroom units does not reflect the wording of the SPG. This states that these typologies should be avoided. The wording of the Policy should reflect the SPG as this represents a London wide approach to design standards (tied into the new National Technical Standards).	The policy will ensure that single aspect dwellings are avoided in these instances. In exceptional circumstances the policy would be applied with flexibility but residential design quality is a high priority for the council.
Table 6 needs clarification as it should set a minimum threshold of unit numbers below which play space should not be provided. It is not practicable or viable to provide small areas of play space for a low child yield development or forms of development which do not generate significant numbers of family units (such as Build to Rent).	The policy will be applied flexibly if provision of a meaningful play space would not be feasible. An off-site contribution to improve neighbourhood play facilities may be acceptable.
Part 6 should be amended to refer to the latest BRE daylight and sunlight guidance.	The policy requires adequate daylight and sunlight along with the residential design quality policy. Performance standards in guidance and other evidence can be applied to determine

	whether a planning application complies with the policy.
Table 6 on playspace should be clarified in-line with the guidance provided in the Mayor's "Play and Informal Recreation SPG" (2012). This sets out that on site playspace is not required where the child yield is under 10 and also acknowledges that there may be existing playspace in proximity to the application site that would sufficiently meet the demands of the proposal. It may be that a sum in lieu payment for updating equipment or further provision of existing playspace, within the vicinity of the site, could provide a better outcome for the community.	The policy will be applied flexibly if provision of a meaningful playspace would not be feasible. An off-site contribution to improve neighbourhood play facilities may be acceptable.
Development flexibility:	
In certain circumstances it may not be appropriate or achievable to provide the requisite level of private amenity/playspace. In such situations, it may be more appropriate to secure a commuted payment which could be to provide or improve open/playspace provision elsewhere.	The policy will be applied flexibly if provision of a meaningful playspace would not be feasible. An off-site contribution to improve neighbourhood play facilities may be acceptable.
Bay windows (subject to detailed design) can be an appropriate way to potentially providing a different aspect, greater outlook or view, and that single aspect homes can be appropriate depending on their outlook and orientation.	The policy seeks to avoid single aspect homes. In exceptional circumstances the policy would be applied with flexibility but residential design quality is a high priority for the council.
Given the size constraints and densities of residential development, it is not always possible to provide dual aspect accommodation, especially for smaller dwellings – this is particularly an issue for studio accommodation. The policy should allow for greater flexibility where dual aspect accommodation cannot be delivered.	The policy seeks to avoid single aspect homes. In exceptional circumstances the policy would be applied with flexibility but residential design quality is a high priority for the council.

DM11 Residential design

Comment Summary	Council Response Summary
There is no justification for the encouragement of ceiling heights of 2.5m (20cm above the minimum (2.3m))	2.5m is recommended in the draft London Housing Design guide. Research evidence base to clarify justification and applicability.
The restrictions on dual aspect are too onerous for studio apartments.	Studio apartments are limited by the NSP and will only represent a small fraction of new homes. The policy will be applied flexibly and where it is robustly demonstrated that studio apartments are necessary but it is impossible for them to be dual aspect this will be taken into account.
'Poor doors' shouldn't be allowed – public areas should be accessible to all residents	'Tenure blind' is the council's response to the 'poor door' issue. It is necessary to use separate cores for management and affordability reasons.

DM12 Tall buildings

Comment Summary	Council Response Summary
Tall Building Locations:	
Many respondents highlighted the importance of clarifying where tall buildings will be located. Some suggested locating them in the regeneration areas is flawed as these are not necessarily the right locations as they could destroy the character of those areas rather than enhancing them.	Policy amended in PSV to clarify that tall buildings must be located in areas with the highest levels of public transport access and where there is the greatest opportunity for regeneration. The policy also requires tall buildings to respond positively to local character which is also protected by other design policies.
Concerned that Peckham Town Centre would be considered appropriate for tall buildings as this is completely out of character and scale to the existing townscape.	Tall buildings policy as well guidance in the Peckham area vision and site allocations will be used to assess applications for tall buildings and ensure that local character is enhanced. Examination of the Peckham and Nunhead Area Action Plan established that a tall building of up to 20 storeys could be appropriate on the Aylesham Centre site.
Respondent has commented that lessons needed to be learnt from the North Peckham estates where high-rise buildings were a negative effect on local communities and whole swathes of the area had to be regenerated a second time to replace these with housing of a scale and quality that better met the needs of local people.	Noted. The policy will be applied to ensure that tall buildings do not adversely affect local communities.
Tall buildings are more appropriate outside of town centres where it is possible to develop new centres with their own character.	The policy does not preclude tall buildings outside of town centres, where they meet the requirements of the policy,
General policy amendments suggestions:	
Also amend part h of policy to say "Maximise energy efficiency, minimise embodied energy and prioritise the use of sustainable materials"	The policy requires materials to be sustainable, which would include the minimisation of their embodied energy.
The approach proposed is dangerously flexible and will encourage speculative development across many sites in the borough which need to be developed for genuine uses within realistic timetables for implementation. Terminology needs to be tightened, for example "point of landmark significance" – their locations should be identified within the plan – and "harmful impact" and "unacceptable harm" should be calibrated.	PSV policy wording has been amended from landmark to townscape significance. Some flexibility is required in order for the policy to be applied to any planning applications that are received. Evidence will be required at the planning application stage to determine whether an impact is harmful.
Policy wordings should include the use of 'only' with regard to where planning permission will be granted to make the requirements stronger in their position.	Policy wording has been amended in the PSV to 'tall buildings must'.
Point B should also make reference to responding positively to the existing street pattern.	The policy can be applied to consider the existing street pattern where this is relevant to local character and the townscape.
Point J should be made applicable to all tall building proposals across the borough.	The requirement for public space for buildings over 30m is applicable across the borough.
Point I should make reference to having a positive relationship with the wider community.	The requirement to improve the public realm and pedestrian experience would benefit people widely as well as the other benefits sought by the policy.
Point C should cross-reference policies DM9, DM10 and DM11 with regard to design guidance.	Policies will be applied to assess planning applications without need for cross reference.
Point I should also make reference to 'other greening initiatives' as there is an increasing number of innovative ways to green areas, in addition to new street trees.	Other greening is required by the green infrastructure policy.

Respondent proposes that this policy be extensively amended to emphasise that planning permissions will not be given to tall buildings, unless they directly meet the requirements of policies DM1 Affordable homes and DM2 New family homes in particular, to discourage expensive exclusive developments which do not meet the needs of Southwark's residents.	Policies will be applied to assess planning applications without need for cross reference.
Points E, F and H can be removed as these are all covered by policy DM9. It should be made clear that Tall Buildings schemes must comply with DM8, 9, 10 and 12 as a minimum. Reference should also be made to Historic England Advice Note 4 Dec 2015 on Tall Buildings.	Policies will be applied to assess planning applications without need for cross reference. Protected views, heritage assets and energy efficiency, however, are central issues to the assessment of tall building applications so they are included in the policy.
Policy wordings should be revised the better reflect the provisions of the London Plan.	It is considered that the policy is compliant with the London Plan.
The policy needs to make clear where the clusters of tall building will be and the range of heights that will be permissible in each of these zones.	Tall buildings, particularly the tallest, may be delivered in clusters and these have been identified in local SPDs and AAPs. Where appropriate we will continue to identify areas for clusters of tall buildings in area-based plans such as the Old Kent Road AAP.
A positive introduction to the policy would be useful setting out the merits of tall buildings, including but not limited to their positive contribution to regeneration, creation of a unique sense of place and identity.	The reasons text has been re-ordered to start with a positive explanation of the council's strategy for tall buildings.
Impact on Views:	
Respondent considers there should be no new tall buildings in front of the views from the rooftops on the Bussey Building, the Multi Storey building, and the proposed high-line coal line walk. Peckham should have the same protection as Nunhead as a predominantly low rise destination.	Design guidance for the Aylesham Centre and Peckham Bus Station has been amended in the PSV to ensure development considers the view from the Bussey Building rooftop.
Recommendation to strengthen the policy as the respondent considers that the impacts of shadowing; over-looking, wind shear and dominance of tall buildings have not been adequately dealt with on the evidence of recent development.	Policy amended in the PSV to require detailed modelling and analysis to ensure that these impacts are better dealt with.
Respondent asks if there is any evidence local communities want high-rise buildings as they consider that very few people are aware of these policies being set in the New Southwark Plan with regard to tall buildings.	A range of views have been expressed relating to tall buildings in response to consultation on the New Southwark Plan.
Permission for tall buildings should not be granted when they impact negatively on designated open spaces.	The tall buildings, design and amenity policies will all be applied to ensure that impacts to neighbouring uses, including open space, are acceptable.
Representation opposes to locating tall buildings on all sides of parks as this diminishes natural light creates shadows and impacts on the open aspects and view afforded into and out of a park. It also potentially creates light pollution from the building into the park.	The tall buildings, design and amenity policies will all be applied to ensure that impacts to neighbouring uses, including open space, are acceptable.
With specific regard to Burgess Park we do not wish to see tall buildings along the south boundary of the park (St George's Way/Parkhouse St). The eight story building "Camberwell Fields" on the corner/New Church Road should be the tallest along the western end of the park. Likewise the 10 storey on Trafalgar Avenue is in fact six storeys and then stepped back through the top four storeys, creating a less dominant impression. We propose that these buildings set the maximum height to appropriately frame Burgess Park.	The tall buildings, design and amenity policies will all be applied to ensure that impacts to neighbouring uses, including open space, are acceptable. Burgess Business Park on the south of Burgess Park has been added as a site allocation with specific design guidance including improved links to the park.
The locational criteria for tall buildings should be amended and widened to provide support for tall buildings located at a gateway to an Opportunity Area or at an important point within	The policy does not preclude tall buildings in opportunity areas, where they meet the requirements of the policy.

an identified Opportunity Area.	
Recommendation that the main view points towards Central London from the Multi-Storey Car Park and the Bussey Buildings should be included as Borough views and so protected by DM17 and DM12e and DM12f.	These locations do not meet our requirements to be designated borough views as long-term public access is not guaranteed. Design guidance for the Aylesham Centre and Peckham Bus Station has been amended in the PSV to ensure development considers the view from the Bussey Building rooftop.
Suggestion that tall buildings should be avoided outside the CAZ, the purpose of which is to cluster tall buildings and this type of investment in to a business district - to start building random tall buildings beyond this will also eventually affect the integrity of the CAZ. London does not need all these overly tall buildings that are for investment and profit and nothing to do with supporting liveable neighbourhoods and local town centres.	Tall buildings can contribute to the physical and social regeneration of Southwark outside of the Central Activities Zone.
Respondent asks how will "unacceptable harm to significance" be judged, against what evidence base, when the significance and sensitivity of different heritage assets varies?	The council has access to historic environment evidence including building listings, conservation area appraisals, London-wide and national guidance and the historic environment record.
New Tall buildings adjacent to the river potentially could have a detrimental impact on the views from within the Inner Ward of the Tower of London and also of the Tower from higher ground to the north, looking south. Following the last Reactive Monitoring Mission by UNESCO in 2011, the World Heritage Committee stated very clearly that any further build-up of tall building in the vicinity of the Shard could put the status of the Tower of London WHS at risk—Respondent asks that this is borne in mind in the sitting of any new tall development.	The world heritage site will be given full consideration by applying the world heritage sites policy as well as the tall buildings policy.
Concern that Burgess Park is highlighted as an area where tall buildings could be sited.	The tall buildings, design and amenity policies will all be applied to ensure that impacts to neighbouring uses, including open space, are acceptable. Burgess Business Park on the south of Burgess Park has been added as a site allocation with specific design guidance including improved links to the park.
Impacts on amenity:	
The increased density of housing in specific neighbourhoods like Peckham need to be accompanied in the NSP with provisions for ensuring that the provision of services is capable of being increased at the same pace as the increase in population. Respondent considers that there seems to be no section in the NSP which deals with this.	Health and town centre policies will secure adequate local services across the borough in town centres.
The link between tall buildings and proximity to public transport could be strengthened by incorporating it into the main policy wording.	Policy wording has been amended in the PSV.
Many respondents were concerned that promoting tall buildings within Regeneration Areas is a too wider area and the policy should be more specific.	Policy amended in PSV to clarify that tall buildings must be located in areas with the highest levels of public transport access and where there is the greatest opportunity for regeneration.
Many respondents opposed the blanket requirement to deliver publicly accessible space at or near the top of tall buildings measuring over 60m is considered inappropriate and can cause issues with regards to building maintenance and security. Instead, the policy should be	The policy will be applied flexibly when assessing planning applications, if it is not possible to provide a public area due to maintenance and security constraints that will be taken into account.

revised to encourage the provision of such publically accessible space, but also make clear that development proposals should be considered on their own merits.	
The policy should ensure tall building proposals will not create unacceptable harm from wind turbulence and noise – and to aviation navigation and telecom/broadcast function.	The policy protects against harmful environmental impacts. The digital infrastructure policy requires applicants for large scale development to engage with digital infrastructure providers
Concerned that the provision of a functional public space and communal space will be actively used to justify (on the grounds of public benefit) the acceptance of tall buildings when considered against the potential harm to the significance of heritage assets. This is further weakened when the harm to heritage assets is qualified by the term 'unacceptable', which implies some harm can happen. This is contrary to the wording related to strategic views, where the judgement is absolute, with 'no harmful impacts'. We would suggest that greater weight is given to the protection and conservation of heritage assets and setting as expressed in their significance.	The policy will be applied to protect the significance of heritage assets. Weight will be given to their significance by decision makers taking into account heritage designations and evidence.
Recommendation to amend this policy to encourage public accessibility in very tall buildings (over 120m) in appropriate central London locations. Accessibility should be focussed on buildings which are principally office or commercial in use where access and security are more easily controlled.	The policy will be applied flexibly when assessing planning applications, if it is not possible to provide a public area due to maintenance and security constraints that will be taken into account.
DM12 part D requires tall building proposals to take account of the cumulative effect of existing or emerging proposals or clusters. The respondent also considers that this policy should take account of the deliverability of approved schemes and proposed schemes. It may be the case that, despite having planning consent, a site may not be deliverable. Where this is the case, development proposals at adjacent sites should not be precluded or undermined by consented schemes which show no signs of being delivered.	The policy will be applied with regard to evidence available at the time of the planning application which might include issues of deliverability.
Refers to daylight, sunlight and outlook but is not clear what this covers i.e. does it cover impacts on occupiers of development, impacts on occupiers of nearby buildings and impacts on nearby parks and open spaces?	The tall buildings, design and amenity policies will all be applied to ensure that impacts to neighbouring uses, including open space, are acceptable.
Review approach to wind assessment and wider comfort considerations/ interactions with sunlight, wind chill, cyclist safety, air quality... (see notes from meeting with City 10/6/16) - minimum level of 'Comfort criteria' for humans at ground level that tall buildings have to meet. i.e. no death rays, downdrafts etc.	Policy amended in PSV to take account of comfort as well as harm from environmental impacts.
Further comments:	
Feasibility studies submitted by developers should be transparent and open to review by interested parties.	PSV policy wording amended to require additional information from modelling. Studies provided at the planning application stage will be open to review but pre-application enquiries are confidential.
Environmental impact studies should be rigorous and transparent.	PSV policy wording amended to require additional information from modelling. The rigour and transparency of evidence submitted will be considered when assessing planning applications.
Recommendation to make use of planning height contours on local maps where high rise	Tall buildings, particularly the tallest, may be delivered in clusters and these have been

applications may be anticipated. This will enable landowners, developers and affected local people to make properly informed decisions. It will prevent make-it-up-as-you-go-along policy in such an important area of environmental concern.	identified in local SPDs and AAPs. Where appropriate we will continue to identify areas for clusters of tall buildings in area-based plans such as the Old Kent Road AAP. This may involve parameter plans for heights, similar to the contours suggested.
It should be made clear that tall buildings will not receive consent outside regeneration areas.	Policy wording has been amended in the PSV removing the reference to regeneration areas. Appropriate locations will be highly accessible with the greatest opportunities for regeneration.

DM13 Efficient use of land

Comment Summary	Council Response Summary
Policy wordings should include the use of 'only' with regard to where planning permission will be granted to make the requirements stronger in their position.	Policy wording amended in PSV to 'development must'.
The policy wordings should include an additional point that provides support for development which reduces space for car parking.	Rigorous car parking standards seeking to help reduce private car use and space given to car parking are applied by the car parking policy.
Reasons for meanwhile uses should be extended to explicitly include provision of cultural as well as community benefits, in particular since cultural organisations - and in particular experienced artists' studios providers - are often well equipped to manage these uses through their experience in short life commercial property, and their well developed organisational and membership structures.	The planning policy will be applied alongside the leisure, arts and culture policy to support cultural meanwhile uses where these benefit the local community.
The policy should reference the efficient reuse of brownfield land, in particular in area action plan areas.	Most development land in the borough is brownfield land and the policy will ensure its efficient reuse.
The policy requirement that ensures the underutilisation of sites is a voided is too sweeping and should be modified and/or appropriately conditioned.	Policy wording amended in PSV to remove reference to underutilisation.

DM14 Listed buildings and structures

Comment Summary	Council Response Summary
General policy amendments suggestions:	
Respondent asks to clarify in point 3 that 'adequate justification' will be where no design option exists that is technically, functionally and financially viable. Without a strong definition of 'adequate' developers may not try hard enough to find conservative solutions.	Policy wording amended in PSV to 'robustly justified'.
The policy should clarify what is meant by the 'significance' of listed structures or buildings and what the policy covers by this definition.	A definition of significance in the context of heritage assets has been added to the NSP glossary.
Policy wordings should avoid the use of 'unjustifiable harm' as this could lead to debate of what is justifiable. It should first instead seek to 'conserve and enhance' – this should be changed.	The policy states that unjustifiable harm will be avoided by conserving and enhancing listed buildings and structures. Any contentious planning application may require some debate as to the justifications involved.

Policy should refer to the preservation of the setting of structures and buildings in addition to the protected asset.	Support noted, the policy refers to setting.
Respondent suggests an overall policy on “heritage” that reflects both NPPF guidance that “preserves and enhances, in a manner appropriate to the heritage asset significance” – but also takes in to account the “existing and proposed character of the area”. This would allow LBS and Neighbourhood Forums to create and consult on visions for the future for different areas via management plans; master plans; SPG and or Neighbourhood plans.	Policies will be applied with reference to evidence, for instance design and access statements, which will take into account the existing and proposed character of the area. The plan does not preclude the development of neighbourhood plans, management plans or master plans.
The policy should make clear that enforcement action will be automatic where there are transgressions.	The enforcement policy prioritises the protection of heritage.
'Justifications' by developers for loss of heritage should be presented in good time for consideration by the community and heritage groups before the Council accept them.	Evidence will be required before a planning application is validated in order to allow the community and heritage groups to comment on proposals.
Recommendation to amend the policy to recognise that contemporary architecture can contribute to the protection and enhancement of the historic environment and development proposals should be assessed individually in terms of their townscape impacts as the respondent considers that it is entirely possible for the best examples of old and new architecture to sit alongside one another where a skilful design approach is taken	The policy does not preclude modern architectural styles providing development preserves or enhances listed buildings and structures and their setting.
Flexibility should be built into these policies to ensure that design proposals are able to respond to their unique settings.	Planning policies will be applied with flexibility and design policies require the consideration of local character.
Listed buildings comments:	
A concern raised by many respondents is that the policy does not mention the protection of locally listed buildings, or to the creation and maintenance of a local list. The creation of local lists is supported by the National Planning Policy Guidance (NPPG) which states that local lists incorporated into Local Plans can be a positive way for the local planning authority to identify non-designated heritage assets against consistent criteria so as to improve the predictability of the potential for sustainable development. Its absence contradicts Southwark's SP2 Policy on the importance of “heritage led regeneration”.	Local lists are supported but not required by national guidance. The council identifies local heritage assets through conservation area appraisals, SPDs and AAPs.
Respondent would like to see more awareness for and protection of existing listed buildings. There have been cases where negligent behaviour has resulted in the loss and harm to significant buildings on Rye Lane.	The enforcement policy prioritises the protection of heritage.

DM15 Conservation areas

Comment Summary	Council Response Summary
Include Conservation Area Management Plans as a consideration where they are agreed by the council and have an established stakeholder group.	Policy wording amended in PSV to reference management plans.
An additional point should be included which requires development to conserve and enhance non-designated heritage assets, including buildings, spaces, and structures such as	Policy wording amended to protect non-designated assets in the conservation of the historic environment and natural heritage policy.

sculptures. Non-designated assets need to be referred to explicitly as a class in the policy, and to be effective, a list of such assets must be available for each conservation area.	
Recommendation to remove the word 'generally' from the policy to confirm demolition will not be granted planning permission in order to mitigate against the risk of buildings being demolished at an increasing rate due to the growing pressure for development.	The policy anticipates planning applications that involve the demolition of a building or structure that provides some positive contribution to the conservation area but the proposal overall would provide a greater contribution. The council would need to be presented with strong arguments to justify any such demolition.
Respondents have requested the revision to the Bermondsey Street Conservation area and The Tower Bridge Conservation Area appraisals as these are considered to be outdated, especially given the long plan period, so decisions about demolition and new redevelopment are fully informed.	Conservation area appraisals are revised outside of the preparation of the local plan.
A number of respondents suggested there should be a condition implemented which requires Conservation Area Appraisals to be updated every ten years.	Conservation appraisals are not updated as part of the planning application process and so this could not be required in the policy.
In addition to Conservation Area Appraisals, respondent requests that point 1 should also make reference to 'any other related documents (including without limitation any adopted Conservation Area Management Plan), in all cases as updated from time to time'.	Policy wording amended in PSV to reference management plans.
The policy should include a clause which allows flexibility and provides support for the installation of solar panels and other renewables in conservation areas when done sensitively.	The policy will be applied flexibly to planning applications and it would not preclude renewable energy generating equipment where the significance of the conservation area is conserved or enhanced.
Recommendation to amend the policy to recognise that contemporary architecture can contribute to the protection and enhancement of the historic environment and development proposals should be assessed individually in terms of their townscape impacts.	The policy does not preclude modern architectural styles providing development conserves or enhances conservation areas.

DM16 Conservation of the historic environment and natural heritage

Comment Summary	Council Response Summary
Include policy hook for Heritage SPD and explanation that there may be unlisted buildings of townscape value	The policy provides requirements on development for the conservation of the historic environment that could be further explained in an SPD if expedient to do so.
A number of respondents have suggested the policy should recognise the importance of non-listed heritage structures which should be considered of significance meriting consideration in planning decisions. A list of such assets should be compiled and made publically available.	Policy wording amended in PSV to protect non-designated assets. The council identifies local heritage assets through conservation area appraisals, SPDs and AAPs.
Respondent considers that the wording of "a dequate justification" requires definition to avoid any argument about what is deemed a dequate. It should be made clear that adequate justification is where no design option exists that is technically, functionally and financially viable.	Policy wording amended in PSV to 'robust justification'.
Concerned that trees seem only protected if associated with a listed building, conservation area, of Tree Preservation Order. It is suggested the policy requires development proposals demonstrate a net increase in number, area, function, and visual amenity of trees, water	Significant protection for trees is afforded by the trees policy.

features, green spaces, and other natural heritage assets. Please note that a line of a few trees along a road, while welcome, does not generally have the same visual or habitat amenity as a small woodland.	
Policy should be amended to recognise that contemporary architecture can contribute to the protection and enhancement of the historic environment and development proposals should be assessed individually in terms of their townscape impacts. This should recognise that it is entirely possible for the best examples of old and new architecture to sit alongside one another where a skilful design approach is taken.	The policy does not preclude modern architectural styles providing development conserves or enhances the historic environment and natural heritage.

DM17 Borough views

Comment Summary	Council Response Summary
Borough views proposal and amendments	
Respondent proposes an additional view: 'The view of Tower Bridge and river panorama from Shad Thames across Portland Wharf open space'.	The proposed river prospect from Kings Stairs garden covers a wider panorama of Tower Bridge and St Paul's Cathedral in this area.
Many respondents suggested the main view points from the Multi-Storey Car Park, the Bussey Building and the Coal Line should be included as Borough views and so protected by DM17 and DM12e and DM12f.	These locations do not meet our requirements to be designated borough views as long-term public access is not guaranteed. Design guidance for the Aylesham Centre and Peckham Bus Station has been amended in the PSV to ensure development considers the view from the Bussey Building rooftop.
Respondent considers that the view from One Tree Hill and the view from Nunhead Cemetery are both undefined in the NSP and too wide ranging picking vast swathes of London including the Opportunity Areas and Regeneration Areas of Old Kent Road, Canada Water, Elephant and Castle, Bermondsey. The important development of these areas and in particular the provision of taller buildings in these areas could be adversely affected by these views.	Policy wording amended and an annex added to the PSV to give better definition to the views. The views have been considered in the development of site allocations for the most significant development sites in the borough.
Respondent suggests that the panoramic view north-west from Dulwich Woods at Sydenham Hill (eastern end of Grange Lane at the Golf Club) should join the view from One Tree Hill in being protected.	The view from One Tree Hill is the exemplary panorama from a high point in the hills in the south of the borough. The proposed view from Dulwich Woods may have similar characteristics but the policy seeks to protect the more significant view.
The policy should be expanded to cover strategic views as there is not sufficient reference to strategic views across the NSP.	Strategic views are referenced in the tall buildings policy and protected under the London Plan.
Suggestion amendments to the policy:	
Decide proportionate approach to mapping and include an appendix	An annex has been added to the PSV.
In respect to Policy 17.1 and 17.2 2 respondents consider that no justification has been made for the inclusion of these views as representing important key views which need to be protected. It is considered that the inclusion of the views within the NSP could have	Policy wording amended and an annex added to the PSV to give better definition to the views. The views have been considered in the development of site allocations for the most significant development sites in the borough.

unforeseen consequences to the delivery of regeneration in key areas of the borough including the Old Kent Road. // Additionally, respondent adds that any local view that forms part of the Local Development Framework should be tested thoroughly and evidenced so that proper consultation and assessment can be carried out.	
The borough views policy should be amended to acknowledge the contribution that new tall buildings can add, especially in AAP areas to create new landmarks.	Support for tall buildings where they contribute to regeneration is afforded by the tall buildings policy. Site allocations have also been added to the plan, indicating the potential for tall buildings on key sites.
The respondent considers that the policy is not in conformity with the London Plan which states development should not harm, and where possible should make positive contribution to strategic views rather than the NSP's requirement to positively enhance the borough views. There are no reasons why a local views should be given greater protection.	The requirement is not intended to be more restrictive on the scale of development than the strategic views in the London Plan. The policy will be applied flexibly where there is no possibility of enhancing the view but harm is avoided.
Respondent requests that a more flexible approach to any future policy should be taken which sets out that harm to views will only be acceptable where this is outweighed by the public benefits of the proposal.	The aim of the policy is to protect the views. If the benefits of a planning application outweigh the harm to the view that would be an exceptional circumstance in which the decision maker would decide what weight to give the other benefits against the harm.
Local residents and communities should have opportunity to provide their own perspectives on the local vistas they value.	The list of views has been available for comment as part of consultation on the NSP providing the opportunity to suggest other vistas for protection.

Amended Policy DM17: Borough Views

Comment Summary	Council Response Summary
<ul style="list-style-type: none"> - Suggests the council should extend and protect the view from the top of Gypsy Hill into the City of London including that of St. Paul's Cathedral. - Suggests the policies should be rigidly enforced in all planning application and development plans without exception unless there is a well advertised consultation; i.e. there must be no Henry VIII powers allowing Planning Officers to agree amendments. - Objections raised to the inclusion of View 1 Panoramic View from One Tree Hill. This location of the origin of the view and its scope remains undefined within the New Southwark Plan and as a panoramic view too wide ranging; covering a vast swath of London including the Opportunity Areas and Regeneration Areas of Old Kent Road, Canada Water, Elephant and Castle and Bermondsey. The impact of this view on the development of key regeneration areas such as the Old Kent Road Opportunity Area has not been fully assessed. - Suggests the scope of this policy is ill defined. Both in terms of 'positive enhancement' and the physical extent of the view. 	<ul style="list-style-type: none"> - The view from One Tree Hill is the exemplary panorama from a high point in the hills in the south of the borough. The proposed view from Gypsy Hill may have similar characteristics but the policy seeks to protect the more significant view. - The planning policy will be applied consistently to planning applications alongside other policies in the development plan with weight afforded to policies by decision makers. - Further detail has been added to the policy and the parameters of borough views have been added in an annex to the PSV. It is considered that this view will not prevent significant development in opportunity areas. - Further detail has been added to the policy and the parameters of borough views have been added in an annex to the PSV.

<ul style="list-style-type: none"> - Notes that several views identified in Policy DM17 are views of St Paul’s Cathedral, and therefore cross from Southwark into the City of London. As a matter of clarity, the respondent considers that the title of Policy DM17 should be amended to include the word ‘strategic’, since by definition any view that affects land in two or more planning authorities must be strategic rather than local in nature. - Suggests that the wording of this policy is unduly onerous. Considers it more appropriate for the policy to require development schemes to have no worse than a neutral effect on borough views, and where possible, result in an enhancement of those views. - Concern is raised with regard to the principle that Southwark’s Development Plan policies should not be applied to secure the protection of long-distance views to points of interest outside of the Borough boundaries, given the Mayor of London’s London View Management Framework (LVMF) (2012) provides protection of important cross-boundary views within the city. Concerned that the ‘reasons’ identified in the draft policy for protecting these six specific views does not provide any clear justification as to why they have been identified for protection. Specific concern raised with regard to the Nunhead Cemetery to St Pauls Borough View, places a limit on height of development, which covers some 16.3 hectares of the Old Kent Road, of which 7.5 hectares is identified for redevelopment. The identification of the view has resulted in the maximum height of development on the Former Car Pound site being limited at 15 storeys. - Concerned about the impact of the proposed ‘Borough View’ from Nunhead Cemetery to St Pauls Cathedral on development at Old Kent Road, specifically the Bricklayers Arms Distribution Centre. - Suggests that DM17 could be strengthened by taking a broader approach to understanding and celebrating and understanding the unique character of the different parts of the Borough by providing protection to a much broader suite of Place-marks than the Borough views which have been identified. - Suggests that for this policy to be effective the use of the phrase “preserve or positively enhance” (view corridors) should be included. - Concern about a lack of detail. 	<ul style="list-style-type: none"> - Noted. The views are strategic in nature but as they have been proposed through the borough local plan rather than the London Plan it is considered helpful to reflect this in the policy title. - The policy will be applied flexibly where there is no possibility of enhancing the view but harm is avoided. - The views have been given further explanation in the PSV. The LVMF does not preclude the identification of protected views by boroughs. Design and capacity studies have been carried out for the Old Kent Road opportunity area that indicate while some sites will be affected by the view of St Paul’s from Nunhead Cemetery, the development anticipated for the opportunity area can be accommodated. - Design and capacity studies have been carried out for the Old Kent Road opportunity area that indicate while some sites will be affected by the view of St Paul’s from Nunhead Cemetery, the development anticipated for the opportunity area can be accommodated. - Design and heritage policies in the NSP will protect and enhance the character of different parts of the borough, beyond protecting view corridors. They are further supported by guidance provided in area visions and site allocations. - The suggested wording is not considered necessary as the policy can be applied flexibly where it is demonstrated there are no opportunities to enhance the views. - Further detail has been added to the policy in the PSV.
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DM18 Archaeology

Comment Summary	Council Response Summary
Suggestion that Archaeological Priority Zones become Archaeological Priority Areas	Terminology updated in PSV.
In Appendix 8, APZ 17 "Horsleydown" seems to exclude Portland Wharf, yet it is within the Southwark boundaries shown in the map of APZ 17. Similarly, although within Southwark, Portland Wharf is not included in the list of Open Spaces in Appendix 4.	This area is included in the proposed Archaeological Priority Areas (APA) in the PSV.
How do the concept of Archaeological Priority Zones (APZ) correlate with Historic England's Archaeological Priority Areas, which are being adopted by neighbouring boroughs, or with national policy in terms of the criteria for inclusion in class I or class II or exclusion from either? For example what would happen if remains of national importance were found outside class I APZ?	Terminology updated in PSV.
Respondent notes that each Zone is named but its significance is not described. Is there evidence to support these policy designations and could this information be used to inform their interpretation?	Zones replaced with broader APAs in the PSV. The historic environment records should be referred to for desk-based assessments within APAs.
Representation suggests that the policies should be amended to recognise that contemporary architecture can contribute to the protection and enhancement of the historic environment and development proposals should be assessed individually in terms of their townscape impacts.	The policy does not preclude modern architectural styles providing development conserves the archaeological resource.
Respondent asks that the policy recognises that it is entirely possible for the best examples of old and new architecture to sit alongside one another where a skilful design approach is taken. Flexibility should be built into these policies to ensure that design proposals are able to respond to their unique settings.	The policy does not preclude modern architectural styles providing development conserves the archaeological resource.

DM19 World heritage sites

Comment Summary	Council Response Summary
The policy should confirm planning permission will only be granted for development that sustains and enhances the significance of Outstanding Universal Value (OUV) of World Heritage Sites and their settings, including views in, out and across the sites.	Support noted, this protection is provided by the policy.
Request that reference is made to the revised Tower of London Management Plan 2016 (which should have been agreed by the time the New Southwark Plan is finalised and adopted), particularly to the "attributes" of OUV.	The policy reasons refer to management plans.
Respondent would find it helpful if a statement could be added explaining how policy DM19 will be implemented and the methodology to be used in assessing the potential impact of new development on the OUV of the WHS	The policy reasons refer to the Statements of Outstanding Universal Value and the management plans of the World Heritage Sites for information.

Respondent would find it helpful if reference could be made to key local views of and from the Tower of London, and approaches to it, as identified in the Tower of London Local Setting Study 2010 published by Historic Royal Palaces.	Any such relevant evidence can be considered when assessing planning applications and an applicant would be expected to refer to it when justifying their proposal in a heritage statement. The policy reasons refer to the Statements of Outstanding Universal Value and the management plans of the World Heritage Sites for information.
Representation suggests that the policy could be strengthened further so that it reflects the unique characteristics of each World Heritage Site and their specific planning issues.	The policy will be applied with reference to statements, management plans and evidence related to the sites to understand any planning issues.
The policy should recognise that it is entirely possible for the best examples of old and new architecture to sit alongside one another where a skilful design approach is taken. Flexibility should be built into these policies to ensure that design proposals are able to respond to their unique settings.	The policy does not preclude modern architectural styles providing development sustains or enhances the outstanding universal value of world heritage sites.

DM20 River Thames

Comment Summary	Council Response Summary
Suggested amendments to policy:	
Evidence base is required for the Thames River policy – this should be a characterisation study and reflect the London Plan policy and supporting evidence.	The Thames Policy Area is a London plan designation, for which the NSP policy is considered consistent. The Bankside Borough and London Bridge Characterisation provide further information about the section of the policy area that it covers.
Policy wordings should include the use of 'only' with regard to where planning permission will be granted to make the requirements stronger in their position.	Policy amended in PSV to development 'must'.
The reference to 'at least one block back from the river bank' should be defined, or the term 'block' replaced by a specified distance.	The term block is a relatively common term and refers to a parcel of development between streets.
Recommendation to include an additional point to ensure development does not detract from or remove key public vantage points of the River Thames.	Key public vantage points are protected in the London Plan.
Respondent considers that further reference to encouraging use of the river for the transport of construction materials, where practicable, should be made.	The highways impacts policy seeks to manage the impact of construction traffic which could involve redirecting some traffic to river boats. These would not typically require planning applications for permanent facilities on the riverside so it has not been added to this policy.
Respondent comments that the policy makes reference to maintaining and enhancing existing facilities but suggests that reference should also be made to the promotion of new facilities as a result of development.	The reference to existing facilities is to ensure that they are protected. New facilities would not be precluded by the policy where they meet its requirements.
Whilst the policy makes reference to flood defences and development adjacent to the river, the respondent considers there is need to highlight the requirement of TE2100 Plan. As the flood defences are improved it will be important to ensure that there is collaboration between adjacent council areas on the planning, design and construction of improvements to the flood defences and the riverside. When defences are raised, it is likely that footpaths and other public access will also require raising in some areas.	The policy secures the protection and improvement of flood defences. Relevant flood defence plans can be taken into account when planning applications are assessed.
The respondent comments that the policy should recognise the importance of the intertidal zone of the River Thames and identify the benefits it provides.	The policy will provide protection for the intertidal zone by maintaining the alignment of the riverbank and restricting development over the river.

The policy needs inclusion and reference of CIL/s106 arrangements.	CIL and section 106 arrangements are set out in the CIL and section 106 policy.
Riverbank protection / flood defences	
Representations consider that developments should seek opportunities to realign the flood defences landward. This has the dual benefit of increasing the flood storage volume of the river and creating additional habitats, for example as terraces. With the twin factors of climate change and development pressure it is essential that tidal rivers remain capable of playing their part in reducing flood risk while supporting the ecological and aesthetic environment.	The reducing flood risk policy is amended in the PSV requiring development to be set back 10m from the existing river defence wall.
In addition to preventing or mitigating against encroachment over the bed of the river, respondent has suggested that there should be a statement emphasising the importance of an undeveloped buffer zone adjacent to the river. This could mean retaining an existing buffer zone, increasing the size of an existing buffer zone or indeed seeking opportunities to create a buffer zone where one does not currently exist. This is necessary for a number of reasons including maintaining or creating a wildlife corridor and preventing over-shading of the channel. 16m is the minimum width under the Thames Byelaws necessary for access for maintenance. For biodiversity a size of buffer zones should be appropriate for a specific development. Point 8 goes some way to achieving a buffer zone by stating 'Proposals for tall buildings should be set at least one block back from the river bank.' This should be more specific by defining 'tall' and also one block back may not be sufficient depending on the height of the development.	The reducing flood risk policy is amended in the PSV requiring development to be set back 10m from the existing river defence wall.
The NSP should commit to deliver the "Southwark Thames Esplanade" which would widen and improve access to the Thames and Thames Path for workers; residents and visitors.	A London Bridge vision has been added to the plan which requires development to enhance the Thames Path in a safe and sustainable way.
Respondent requests that it should be made clear that any application which blocks, or would otherwise endanger, a continuous Thames Path would be refused.	The policy requires the maintenance and enhancement of the Thames Path which would allow applications to block the path to be refused.
Bullet point 7 that recognises the benefits of developments in providing landmarks that are of cultural and social significance along the rivers should be reworded to include the benefits of providing landmark buildings, whether for cultural, social uses, or any other uses in respect to providing orientation points and pleasing views without causing undue harm.	The requirement refers to the significance of the landmark created rather than the land use. Other policies will determine the suitability of the proposed land use.
Respondent considers that acknowledgments should be made to encourage contemporary architecture that enhances the experience of the River Thames.	The policy does not preclude modern architectural styles providing development meets the requirements of the policy.

The respondent proposes that the final sentence of part 8 “Proposals for tall buildings should be set at least one block back from the river bank” has no justification in the reasons and is not founded upon the proceeding criteria. To the contrary tall buildings often offer up the opportunity to enhance the public realm and provide benefits such as “new access points to for the River Thames”.	The requirement to set back tall buildings from the river relates to the Thames Policy Area in the London Plan which requires less tall buildings on the river frontage due to its sensitivity. The block back requirement is an extension of that principle. The policy seeks to prevent walls of development that ‘stadium’ the River and to protect views. Some taller buildings may be appropriate on the river front provided they comply with the tall buildings policy but the tallest proposals will not be acceptable directly on the river front.
Should there be protection against effective 'land reclamation'?	There is unlikely to be any land reclamation from the Thames, for which the flood risk impacts would be very hard to justify, and the policy protects the alignment of the river bank.
Biodiversity enhancements:	
Biodiversity enhancements and linking green infrastructure to the river, as per work of the Thames Estuary Partnership	Green infrastructure and biodiversity enhancements are required by the green infrastructure and biodiversity policies,
The policy should provide more guidance and emphasis on the biodiversity value of the river, particularly the foreshore. This should entail preventing or mitigating for the process of ‘encroachment’, i.e. building into or over the bed of the river in addition to habitat creation or enhancement along the foreshore. As a minimum the respondent would expect to see this as mitigation for any encroachment and for large developments, and would expect to see additional biodiversity enhancements	The river and foreshore are designated as a Site of Importance for Nature Conservation, protected under biodiversity policy. Applications would need to avoid harm to biodiversity and where this is not possible mitigate or as a last resort compensate for the harm.

DM21 Education Places

Comment Summary	Council Response Summary
Representation considers that this policy is lacking essential information on how the Council will ensure that provision is made for new preschool, primary, secondary, further or higher education facilities	Policy amended in PSV requiring development to provide new school places where they are needed.
Respondent has suggested that further explicit recognition be given to the specific requirements and drivers of school design and the specific constraints of sites. The government provides non-statutory indicative guidance for space requirements for educational facilities and funding packages are linked to these specifications	Policy amended in PSV to ensure that school facilities provide for the floor space, external area and design requirements of national guidance.
There is scope to include facilities for cultural and arts education within this section, which are able to be shared with the community through access and activities more openly than many traditional education places.	Policy amended in PSV to highlight arts and cultural facilities that could be shared with the community.

DM22 Student homes

Comment Summary	Council Response Summary
Some representations considered the policy to be too unrestrictive and will result in too many student homes	The policy places robust requirements on student housing to deliver affordable homes and affordable student rooms. This will limit any financial incentive to overprovide student homes. A large portion of development in the plan period will come forward on site allocations, and student accommodation on these is restricted to 5 sites in the PSV.
Student homes should be considered acceptable outside regeneration areas where the following considerations are satisfactorily answered: Does the scheme prejudice the ability of the Council to meet its housing requirements for conventional dwellings? Does the location offer convenient linkage to higher education establishments, with good levels of public transport accessibility? Is there sufficient local infrastructure to support the proposed student population? Would the development cause harm to the local character or residential amenity through an over-concentration of student homes?	Policy amended in the PSV removing the locational restriction on student homes.
Respondent considers that the requirement for conventional affordable housing where the accommodation is linked to a university will necessitate the university to set higher rents for the students which damages the competitiveness of the university	Where viability is an issue that can be considered when assessing planning applications where evidence is provided in line with affordable housing policy.
Respondent considers that the additional cost incurred by this level of affordable housing provision will ultimately be passed onto students by private developers, resulting in developed student housing which is increasingly unaffordable for many students.	Private operators of student housing will charge what they believe students are willing to pay. There would be no incentive for developers to pass on reductions in affordable housing requirements as rent reductions.
Greater clarity is requested as to whether affordable student rooms or affordable housing takes priority in the event that viability determines that both will be unachievable.	Policy amended in PSV to confirm that conventional affordable housing is the first priority.
Respondent proposes that the affordable housing requirement for student development be increased to 50%, 70% of this to be social rented, 30% to be intermediate and that no area in the borough has requirements that fall below this. Delete the requirement that 'nominated further and higher institutions' provide only as much conventional affordable housing 'as is viable' as student housing is profitable.	For direct let student accommodation the policy requires over 50% of the development to be affordable housing, made up of conventional affordable housing and affordable student rooms. The policy must support affordable student rooms under the London Plan. For nominated student rooms the maximum viable amount of affordable housing is sort.
The London Plan stipulates in paragraph 3.53C that affordable housing should only be required where the accommodation is not robustly secured for students. In addition an element of affordable student housing is only required where there is not an undertaking with a specific academic institution.	There is no specific policy requirement in the London plan restricting affordable housing requirements on student housing.
The policy encourages student homes in regeneration areas, however the borough CIL rate is half that of standard residential homes. Respondent requests the council consider the potential implications of this policy on future infrastructure funding streams in the OKR OA.	Policy has been amended in the PSV to remove locational direction to regeneration areas. CIL rates are set with reference to viability testing at levels that will not discourage development. The NSP requires development to be supported by a adequate infrastructure, some but not all of which will be funded by CIL.

<p>1. Could this point be clarified further i.e. the term ‘Schemes providing direct let student rooms at market rent...’</p> <p>2. Similarly, does the word ‘Scheme’ mean accommodation provided by a developer and/or ‘Schemes’ where an HEI is building accommodation for its own students.</p> <p>It will not always be appropriate to provide conventional affordable housing as part of an on campus student accommodation development. It would be helpful; therefore, to have clarity around this section as to what is actually refers to.</p>	<p>Policy wording amended for clarity in the PSV.</p> <p>Where on-site affordable housing is not feasible, off-site affordable housing nearby or if that is not possible an in lieu contribution would be acceptable.</p>
<p>Respondent suggest that where a Higher Education Institution is developing and providing student accommodation, it should not be required to provide any affordable housing and the 27% figure should not be applied where the Higher Education Institution is demonstrably letting the student accommodation at rents which are less than comparable schemes in the open market and not at the level of affordability suggested within your approved CIL scheme.</p>	<p>Where a higher education institution is developing student accommodation that would usually be nominated for that institution. As such the policy would only require conventional affordable housing as far as is viable.</p>

Amended Policy DM22: Student Homes

<p>Amended Policy DM22: Student Homes Consultation Summary:</p>	
<ul style="list-style-type: none"> - Suggests that the opening sentence to the emerging policy should state: "Planning permission will be granted for student homes in Regeneration Areas sustainable locations that are accessible to the universities they serve in order to support the growth of universities and colleges where..." - Additional clarity is requested on the meaning of ‘affordable rent’ for students within purpose-built student accommodation schemes. This would help to better understand how the policy will be practically applied in a consistent and equitable manner. It is also requested that it be made clear as to how affordable rent will be calculated on an ongoing basis, along with the frequency with which this will be reviewed and the process in place for rent reviews to subsequently be agreed upon. - Policy DM22 (affordable housing for student homes) requires that direct-let student housing schemes include 35% affordable housing and 27% affordable student rooms. Suggests this is in conflict with the Mayor’s Housing SPG (2017 Update) which, whilst recognising the importance of affordable accommodation, requires the maximum reasonable provision having regard to viability. 	<ul style="list-style-type: none"> - Policy has been amended in the PSV to remove locational direction to regeneration areas. - The London Plan sets out that affordable student rooms should be provided in the context of average student incomes and rents for broadly comparable accommodation provided by London universities. The detail of proposals for how rent might be reviewed will be considered when assessing planning applications and determining appropriate planning obligations. - The policy will be applied flexibly and where the provision of affordable housing and affordable student rooms is not viable this will be taken into account. This must be robustly demonstrated.

<ul style="list-style-type: none"> - Notes that the provision of 35% of the Gross Internal Area as affordable housing, and 27% of student rooms let at an affordable rent is consistent with the previous Preferred Options draft from October 2015. However, the New and Amended Preferred Option adds within the supporting text that “Where there are applications for ‘collective living’ then these will be considered in the same way as student homes including affordable housing.”. It is considered that more clarity is required around this sentence. We would like to understand Southwark’s definition of ‘collective living’ in this instance, as this is not defined within the Preferred Option, or the New and Amended Preferred Option. It is considered that Policy DM22 would benefit from a definition of this. Similarly, it is not clear exactly how the affordable requirement is defined, when decisions are considered in the same way as student homes ‘including affordable housing’ - Supports requirements for affordable housing (35%) within schemes providing direct-let student rooms. Would like to see more details on the formula used to determine the rent levels of the additional 27% of rooms “let at a rent that is affordable to student”. - The draft NSP is considered to be unsound in respect of the inappropriate and unjustified inclusion of ‘collective living’ within emerging policy DM22 (student homes). We consider that the draft Policy DM22 has not been prepared positively in response to an up to date and objectively assessed evidence base, nor has it been considered alongside any suitable alternatives. - Concerned that this policy is specific to student housing and not co-living. The policy is therefore directed by the distinct supply and demand factors that have been assessed by the Council in the SHMA. The supply and demand factors of ‘co-living’ have not been addressed in either the SHMA, or commented on in the reasons supporting draft Policy DM22 – it is therefore not justified or appropriate to state that such development will be ‘considered in the same way as student homes’. - Suggest DM22 could be strengthened to provide for more public and local community benefit where such development takes place. - The policy and its supporting text currently do not provide viability evidence to justify the need for the 27% element to be made available as affordable to students over and above the existing adopted policy position of 35% affordable housing provision. Further viability evidence is sought to fully understand the Council’s rationale for adding a further element of affordable housing which would allow independent corroboration and 	<ul style="list-style-type: none"> - Policy reasons amended in PSV to clarify that conventional affordable housing will be required where the 35% target can be exceeded rather than affordable student rooms. Collective living is similar in format to non self-contained student housing but not limited to students. - The London Plan sets out that affordable student rooms should be provided in the context of average student incomes and rents for broadly comparable accommodation provided by London universities. - It is considered that the NSP has been prepared positively, informed by an up-to-date evidence base and reasonable alternatives have been considered in the development of policy. - Collective living is similar in format to non self-contained student housing but not limited to students and it is therefore considered appropriate for it to be treated with a similar approach. It has not been demonstrated that there is a specific need for this model of housing, which may not be suitable for many lifestyles, or whether it needs to be considered directly in strategic housing market assessments. - Policies throughout the NSP will secure wider benefits from development including student housing. The Housing Policy Viability Study (2015) identified that the affordable housing requirement for student housing should be as set out in the policy. - Policy has been amended in the PSV to remove locational direction to regeneration areas.
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<p>viability testing.</p> <ul style="list-style-type: none"> - Suggests that student accommodation should be encouraged within regeneration areas, but also allowed in other locations where appropriate. - Suggests that affordable student rooms within direct let schemes should be subject to a viability test. - Questions the compatibility of long term affordable housing and student accommodation. - Suggests the policy should be broadened to include support for the use of student buildings during vacation periods for temporary visitor accommodation in line with the London Plan. - Suggests that in line with Policy DM22 'Student Homes' student accommodation will be supported within the borough's regeneration areas. This definition is highly geographically restrictive. The policy should be amended to be more flexible. It should encourage student accommodation within regeneration areas, but also allow development in other locations where appropriate. Respondent considers that the 35% is too low for the content of social housing included and requests that this is increased to at least 40%. - Respondent considers that this policy should secure the fullest possible use for cycling and suggests amending the policy to read "There is an excellent public transport accessibility level and conditions for cycling, in terms of access to cycle routes and cycle parking" 	<ul style="list-style-type: none"> - The policy will be applied flexibly and where the provision of affordable housing and affordable student rooms is not viable this will be taken into account. This must be robustly demonstrated. - The feasibility of accommodating both housing types on a development will be considered when assessing planning applications and where demonstrated to not be possible off-site affordable housing would be accepted or in exceptional circumstances an in-lieu financial contribution. - The implications of dual-use as visitor accommodation can be considered against other policies in the NSP when considering planning applications. This would not be precluded by this policy - Policy has been amended in the PSV to remove locational direction to regeneration areas. - In line with the London Plan the policy seeks affordable student rooms in addition to conventional affordable housing rather than increasing the target above 35%. - The cycling and parking policies in the NSP will secure facilities for cycling.
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DM23 Transition of preferred industrial locations to mixed use neighbourhoods

Comment Summary	Council Response Summary
<p>A similar policy introduced in 2002 has proved disastrous in Lambeth which has led the LPA unable to defend employment sites against predatory housebuilders. It is untenable to mix many employment uses with residential uses which make the commercial development untenable.</p>	<p>Policy has been removed in the PSV and replaced with a strategic protected industrial land policy and designations to protect and intensify industrial areas for specific types of industry that are unable to be accommodated within mixed use developments.</p>
<p>Demand for business space in the borough is changing however it is important to ensure that there is still sufficient land within the borough for business uses, such as B8 self-storage. The site at 49-65 Southampton Way, which is within the Parkhouse Street Local Preferred Industrial Location, continues to be suitable for such industrial uses and therefore Parkhouse Street should be retained as Preferred Industrial Location in the emerging policy.</p>	<p>Policy has been removed in the PSV and replaced with a strategic protected industrial land policy and designations to protect and intensify industrial areas for specific types of industry that are unable to be accommodated within mixed use developments.</p> <p>Burgess Business Park, including Parkhouse Street, has been included in the site allocations to achieve both an uplift in employment and delivery of new homes in a mixed use neighbourhood.</p>
<p>Encourage the Old Kent Road Gasworks be removed from the PIL allocation and be allocated as “white land” so as to offer the flexibility necessary to bring forward decommissioning and enable redevelopment in line with adopted London Plan Policy and NPPF policy.</p>	<p>Policy has been removed in the PSV and replaced with a strategic protected industrial land policy and designations to protect and intensify industrial areas for specific types of industry that are unable to be accommodated within mixed use developments.</p> <p>Part of the gas works is included in a site allocation in the PSV to enable redevelopment.</p>
<p>Loss of industrial space should be carefully considered. All too often independent businesses and skilled jobs are lost to low skilled and underpaid service industry employment. Employers that provide opportunities for people to develop a range of skills and deliver different products and services are needed. Not just a reliance on retail chains. The Council should support light and workshop type industrial uses to rediscover and stimulate local manufacturing / production of goods, not just sales.</p>	<p>Policy has been removed in the PSV and replaced with a strategic protected industrial land policy and designations to protect and intensify industrial areas for specific types of industry that are unable to be accommodated within mixed use developments.</p>
<p>There should be some clearer definition of what are the objectives in changing areas of existing industry to mixed use. Are there particular kinds of work that should be promoted in mixed use areas?</p>	<p>Policy has been removed in the PSV and replaced with a strategic protected industrial land policy and designations to protect and intensify industrial areas for specific types of industry that are unable to be accommodated within mixed use developments.</p> <p>The office and business development policy has been updated in the PSV indicating some of the uses to be included in mixed use development.</p>
<p>The policy does not give a adequate recognition to industrial uses of the land as well as the creation of jobs. All over London the rate of loss of industrial land is accelerating and needs to have specific protection, potentially in percentage terms.</p>	<p>Policy has been removed in the PSV and replaced with a strategic protected industrial land policy and designations to protect and intensify industrial areas for specific types of industry that are unable to be accommodated within mixed use developments.</p>
<p>It should be noted that whilst the Bakerloo line extension (BLE) is one of the Mayor’s priority transport improvement projects as outlined in his London Infrastructure Plan 2050, it currently has no formal funding mechanism. In addition, its delivery is likely to be towards</p>	<p>Different scenarios for the Old Kent Road opportunity area have been considered and described in the evidence base to the Old Kent Road AAP.</p>

the end of the plan period and therefore scenario planning should be considered in the absence of the BLE being delivered.	
It would be a concern if the NSP encourages redevelopment of sites in absence of re-provision/identification of suitable alternatives, in line with London Plan policy 6.2 (safeguarding land for transport). Employment areas in Old Kent Road, South East Bermondsey, Mandela Way and Parkhouse Street, currently provide important sites for infrastructure which serve the borough and/or Central London such as the waste depot and the Mandela Way bus and Dial-a-Ride garages together with a range of smaller business fulfilling similar functions. Many of these uses make a significant contribution to local employment. Therefore site specific policies review will need to consider retention of such facilities either in situ, as part of a redevelopment for a mixed use scheme or through suitable relocation.	Policy has been removed in the PSV and replaced with a strategic protected industrial land policy and designations to protect and intensify industrial areas for specific types of industry that are unable to be accommodated within mixed use developments. The office and business development policy has been updated in the PSV indicating some of the uses to be included in mixed use development.
The policy fails to make a commitment to more affordable premises.	Small and independent business space is protected by the small and independent business policy which requires affordable space to be considered to retain occupiers.
Transition will mean a temporary loss of employment floorspace as transition development is begun. So it is critical to continue to support employment in CAZ and particularly in locations such as London Bridge to ensure no loss of jobs/office growth as places like the Old Kent Road (preferred Bakerloo Extension), gets ready for employment growth and 25k new homes. This should be supported by a policy on CAZ and London Bridge as a unique employment location on its own.	The office and business development policy has been updated in the PSV to clarify that employment space is protected in the CAZ. Site allocations have been added to the plan and in the CAZ they seek an uplift in employment space.
Through the use of area specific policies the Council should seek to incentivise the development of former PILs, promoting very high and ultra-high densities and taller buildings and taking a pragmatic approach to affordable housing; ensuring that development opportunities are not burdened by the costs associated with the development of brownfield land and that the important regeneration of this key area does not stall.	Site allocations have been included in the plan where industrial allocations have been removed. Higher densities and taller buildings will usually be appropriate as existing uses are usually single story with large servicing or parking areas. Affordable housing remains a high priority and the maximum viable level will be sought without stalling regeneration.
The policy presumption towards no loss of employment floorspace could jeopardise the delivery of housing and jobs on sites with the many existing low density uses impacting on potential viability of schemes. It should instead focus on employment densities rather than floorspace.	Policies and site allocations continue to protect the quantity of employment floor space. This will allow increasing employment densities to provide an uplift in jobs in the borough, including opportunities secured for residents. Testing of design options in the Old Kent Road area has shown that employment space can be re-provided while providing a significant number of homes.
The jobs created should reflect the character of the area that is being created with smaller SME accommodation and flexible creative spaces. Within the Old Kent Road existing low density employment uses such as warehousing should be replaced by higher densities of employment uses such as offices and SME accommodation, These uses will deliver significantly more jobs with a considerably reduced footprint allowing other uses to be delivered to create the objective of mixed use neighbourhood.	Policies and site allocations continue to protect the quantity of employment floor space. This will allow increasing employment densities to provide an uplift in jobs in the borough, including opportunities secured for residents. Testing of design options in the Old Kent Road area has shown that employment space can be re-provided while providing a significant number of homes.
The railway viaduct arches in Bermondsey comprise part of the South East Bermondsey PIL. Proposed Policy DM25 promotes the use of railway arches for a mix of business, retail and	The PSV now proposes strategic protected industrial land and site allocations which clarify which uses are acceptable where on former PILs.

community uses. However, based on the current wording of DM23 it would appear that retail and community uses might not be considered acceptable in this instance until the review of the PIL has taken place. It is suggested that Policy DM23 be worded to ensure consistency with Policies DM23 – 25.	
Clarity is requested in respect of which developments will be expected to contribute towards the infrastructure funding for the Bakerloo Line extension and the mechanism proposed to capture this funding.	The council has revised the CIL charge in the Old Kent Road area to help fund the BLE extension. Other funding will be sought outside of development contributions towards the total cost.
Explicit reference to cultural as well as community uses as compatible alternatives to business uses would be welcome within new mixed use neighbourhoods, in particular since many cultural production spaces have historically occupied industrial locations and constitute employment space for creative and cultural practitioners. They are often not able to compete on direct economic terms with commercial operations, but help to ensure the richness and diversity of cultural life in the borough.	The PSV now proposes strategic protected industrial land and site allocations which clarify which uses are acceptable where on former PILs.

Amended policy DM23: Transition of Preferred Industrial Locations to Mixed-use Neighbourhoods

Comment Summary	Council Response Summary
<ul style="list-style-type: none"> - Considers this deletion to render the NSP un-sound. Prior to its deletion, Policy DM23 was in accordance with national policy set out in the NPPF, which resists the safeguarding of redundant commercial and industrial land and supports the delivery of mixed use development on these brownfield sites. - Questions and would like clarity as to why Policy DM23 was deleted. 	The policy has been deleted and replaced with a new strategic protected industrial land policy and allocations on retained industrial land and facilitates the transition to mixed-use neighbourhoods of other industrial locations via site allocations.

DM24 Office and Business Development

Comment Summary	Council Response Summary
<p>Policy Flexibility:</p> <p>Three respondents considered that to ensure flexibility, a 12 month marketing exercise should be sought rather than 18 months. The policy should provide for the ability for applicants to submit bespoke marketing evidence demonstrating why the site is not suitable for on-going employment, particularly where buildings are dated and the cost of bringing it up to the required standard would be unviable. This would still enable the Council to safeguard employment land, but would enable it to respond more flexibly where a very clear and robust case can be made that the employment land is no longer suitable for such use and can contribute to meeting the development needs of the borough through other forms of sustainable development.</p>	The policy now increases the marketing period to two years in the PSV. The locational areas are more specific and are no longer as extensive. The CAZ, town centres and opportunity areas have significant demand for new employment spaces. The aim of the policy is to retain and where possible increase the quantum of employment land in the areas to meet future demand and promote mixed use development with a range of employment spaces. The council considers that in these locations the robust method to establish that there is no demand for any of the possible configurations of employment space is with a comprehensive marketing exercise.

One respondent considers the policy is too rigid and inflexible and does not have regard to other relevant policies namely Paragraph 22 of the NPPF. It is not considered beneficial that a building lay vacant for a period of almost 2 years. This does not help in the regeneration of areas and furthermore vacant building can attract anti-social behaviour which is detrimental, especially for surrounding residential uses.	Securing employment space will meet the council's aims for regeneration in specific areas. Some vacancy of sites is an inevitable aspect of regeneration. The efficient use of land policy supports meanwhile uses while sites are vacant.
Support for policy:	
Supportive of the policy as it will ensure that there is a supply of sites for industrial uses and will allow businesses to grow.	Support noted.
The previous protection of the Parkhouse Street Preferred Industrial Area as a possible public transport depot in the Core Strategy appears to have been removed from the New Southwark Plan preferred option and this approach is supported by the respondent to ensure development of the site can occur for other uses.	Support noted.
Industrial land	
The respondent considers the policy fails to provide sufficient clarity on the acceptability of the release of employment sites outside of the designated Regeneration Areas and Town Centres, namely in proposed site allocations in the Old Kent Road AAP area which fall outside of PIL designation. Suggested policy rewording to ensure that the release of employment sites for alternative uses is acceptable in principle, subject to complying with all other relevant policies in the Local Plan.	Policy has been amended in the PSV to clarify where employment space will be protected. Site allocations have been added for the Old Kent Road area setting out the required land uses.
Whilst the importance of workspace providers has been noted, the respondent considers that there are no recommendations, protections or suggestions as to how to keep them in the Old Kent Road area as redevelopment occurs.	The small and independent business policy supports management by workspace providers.
The respondent considers that this policy seems to downgrade the importance of small industrial land use. The respondent recommends that the New Southwark Plan make explicit reference to the successful industrial uses in residential areas and that if the land is being used successfully as an industrial area, there should not be an assumption that it can be released for residential uses.	The small and independent business policy has been amended in the PSV requiring development to retain small and independent business space across the borough.
Loss of commercial space has been identified as a matter of concern to many Better Bankside businesses. If and when the exemption from Permitted Development Rights in the Central Activity Zone ceases, we support the introduction of Article 4 Directions in Bankside (and other Regeneration Areas) to ensure that planning applications are required. Other boroughs where PD is already in place report that as well as poor standards of residential development, bypassing the planning process through PD means that no provision for affordable homes is required.	Noted.

<p>“Rigorous marketing exercise” could be defined further; these could be made transparent, as in other boroughs. Additional restrictions included, e.g. permission will not be granted for redevelopment where the continued use of existing small and medium sized units meet occupier needs.</p>	<p>Policy wording has been amended in the PSV requiring marketing for a longer period both its existing condition and as an opportunity for an improved employment use through redevelopment. The policy also supports retention of employment space through mixed use development.</p>
<p>General amendment suggestions:</p>	
<p>The respondent considers that “affordable” space as stated in the Strategic policy SP4 has not been implemented in DM23 and DM24 and suggests that these policies emphasize the need to provide small and affordable business spaces as these may be lost in the “transition to mixed use”.</p>	<p>The consideration of affordable space is required by the small and independent business policy.</p>
<p>Representation considers that it is not clear from the Council documentation/studies if the 2036 target is for 34k or 47k jobs growth and 460m2 or 530m2 office floor space growth – and request that the council confirm this.</p>	<p>Policy reasons have been amended in the PSV to clarify that the plan seeks to address the need for 460,00 sqm of new office space in the CAZ and 47,000 new office jobs over the next 20 years.</p>
<p>Recommendation to expand this policy to set the Southwark Economy scene and show what Southwark will do to promote jobs and business. At the moment the policy lacks ambition and a proper sense of purpose.</p>	<p>The policy reflects the council’s ambition to protect and increase employment space. The council also has an adopted Economic Wellbeing Strategy.</p>
<p>Recommendation to support Southwark’s CAZ to be a globally significant place of modern commerce, enterprise and connectivity. Southwark should give greater weight to offices in the CAZ, particularly in the Bankside, Borough and London Bridge Opportunity Area, (the North); whilst in Elephant and Castle and the Old Kent Road, (the South) employment and housing will be given equal weight. As set out in London Plan Policies 2.10 and 2.11 Southwark should support the CAZ priorities and strategic functions as it applies to locations in its Borough.</p>	<p>The policy seeks the protection and increase in office space in the CAZ. Area visions and site allocations for neighbourhoods in the CAZ have been added to the plan, seeking land uses consistent with the CAZ functions and provided area and site based guidance to achieve CAZ priorities and functions.</p>
<p>Three respondents felt greater emphasis needs to be placed on employment density rather than floorspace. Suggestion that the policy should be amended to take into account existing job numbers. The emphasis should be on creating jobs and this can best be achieved through the delivery of a appropriately sized Class B1 accommodation (principally Class B1a) and smaller SME type units with an emphasis on affordable business space. This delivers an efficient use of land which allows other uses and enhanced public realm to be provided within schemes. The use of floorspace would deter potential development as the demand for large areas of business uses in an area may be limited but higher density employment use can still deliver the number of jobs needed to maintain a genuine mixed use character.</p>	<p>The aim of the policy is to retain the quantum of employment land in the areas where it is the council’s strategy to increase employment and promote mixed use development with a range of employment spaces.</p> <p>There is no evidence that demand is limited for employment space in these areas. The policy has been amended in the PSV to encourage mixed use development and the reconfiguration of space for a range of possible employment uses. Given this flexibility development should not be deterred.</p>
<p>Respondent considers that the New Southwark Plan, in accordance with the London Plan, should acknowledge the contribution that land use swaps and credits can make to the delivery of mixed use developments and reflect this in policy to enable land owners to deliver a greater quantum of housing, including affordable housing, and commercial space as part of a wider mixed use approach. This clearly needs to be framed within the context of</p>	<p>The mechanism suggested in the CAZ SPG would involve developers paying a financial contribution where office space is to be lost through housing-led development in the CAZ.</p> <p>The NSP will increase office space in the CAZ through requiring an uplift on site allocations and otherwise protecting against the loss of office space in the CAZ, subject to a marketing</p>

<p>particularly high land values within the CAZ. Respondent recommends that the Policy DM24 provides a mechanism for this approach as supported by the Mayor's draft Interim Housing SPG (2015) and the draft CAZ SPG</p> <p>Respondent considers an appropriate 'nearby' area within which to allow 'swaps' and 'credits' would be the individual Regeneration Areas. Restricting 'swaps' and 'credits' to within these key growth areas would ensure that the Regeneration Areas maintain a mix of uses and their unique character, while also ensuring the use of 'swap's and 'credits' allows uses to move logically around the Regeneration Area while further advancing the policy objectives of Regeneration Areas and the wider development plan.</p>	<p>exercise in exceptional circumstances. In addition to this the NSP could require developers to pay a financial contribution after the marketing exercise has demonstrated office space is not in demand but the council is not proposing to apply this additional burden.</p> <p>New homes will be delivered in addition to offices through redevelopment on site allocations.</p>
<p>Respondent has commented that B1C spaces are essential to the art and cultural economy who often are competing with bigger businesses (with higher economic means) for these spaces. Affordability being key to the livelihood of such businesses, these spaces will require special protection to remain at the heart of communities as these are improved and regenerated. Another respondent requests that specific reference should be made to the protection of existing cultural facilities and the creation of new opportunities; The New Southwark Plan needs to explicitly protect and create cultural production space across the borough.</p>	<p>Arts and cultural workspace is protected by the leisure, arts and culture and small and independent business policies.</p>
<p>Specific reference needs to be made to the protection of existing cultural facilities and the creation of new opportunities where new mixed use neighbourhoods and communities are emerging.-The New Southwark Plan needs to explicitly protect and create cultural production space across the borough.</p>	<p>Cultural spaces are protected by the leisure, arts and culture, community uses and small and independent business policies.</p>

Amended policy DM24: Office and Business Development

Comment Summary	Council Response Summary
<ul style="list-style-type: none"> - Suggests that the newly proposed policy is more restrictive than currently adopted policies as it seeks to protect business floorspace across the Borough rather than just locations as set out in i) – iv) of Saved Policy 1.4 and points 2 and 3 of Core Strategy Strategic Policy 10. Requests additional information is provided in order to justify this change in approach. In its current form it is considered that there is insufficient evidence for this policy and a suggested rewording of the policy is set out above. - Amended Policy DM 24.2 requires business floorspace to be marketed for a period of 18 months prior to the submission of a planning application where employment floorspace is not retained. It is considered that requiring 18 months marketing evidence is too onerous and will result in business units being left vacant for a significant period of time, which 	<ul style="list-style-type: none"> - Policy has been amended in the PSV to apply the policy to the Central Activities Zone, town centres, and opportunity areas and where specified in site allocations. - The policy now increases the marketing period to two years in the PSV. The CAZ, town centres and opportunity areas have significant demand for new employment spaces. The aim of the policy is to retain and where possible increase the quantum of employment land in the areas to meet future demand and promote mixed use

<p>could negatively impact on the vitality of town and local centres.</p> <ul style="list-style-type: none"> • • • <p>- Suggests it will not be possible to rigorously market test all employment space situations for 18 months prior to a planning application as the application will often be run in parallel with the remaining periods of limited or declining occupation but where there is no appetite by a site owner to market the buildings in their existing condition which is often poor, out of date or semi derelict condition, and due to the need to make best use of a site for mixed use purposes.</p> <p>- Suggests in assessing whether a loss of employment floor area may be justified quantitatively, consideration should also be given to the quality and type of employment floor space that may be provided on-site as part of a mixed-use scheme.</p> <p>- Suggests Policy DM24 should be amended to state that "planning permission will be granted for development that retains existing levels of business (B Use Classes) and/or other employment generating floor space (suigeneris Use Class) except where there is no demand for either the continued use of the site for business or for redevelopment involving re-provision or where it can be demonstrated that the employment floorspace to be provided is designed flexibly to meet the current and future demands of small and medium sized businesses".</p> <p>- Supports the Council's approach to retaining or increasing the amount of employment floorspace and jobs in the CAZ and regeneration areas where there is demand; and support in principle the need to consolidate on-site servicing, re-provide for or relocate existing users, provide affordable SME workspaces and to boost skills. However, it is important that such provisions are sought in a flexible and pragmatic way so as not to undermine the viability and deliverability of schemes.</p> <p>- Suggests the introduction of a set affordable office and business space requirement (i.e. xx% of new Office/Business floor space should be affordable). Where re-development causes businesses to be re-located, an appropriate re-location plan should be produced.</p> <p>- Suggests the vitality of existing light industrial businesses rely on the characteristics of their existing premises. Southwark should identify these unique characteristics, largely of B1c light industrial, which is well suited to its current active uses (Cass reports and Southwark newly commissioned report by GVA + oo: architects should evidence this).</p> <ul style="list-style-type: none"> • <p>- Concerned that a no net loss onus left to developers will focus on number of potential jobs delivered, rather than suitability of premises for business needs or volume of employment space.</p> <p>- Suggests the location of business premises within increased density development zones</p>	<p>development with a range of employment spaces. The council considers that in these locations the robust method to establish that there is no demand for any of the possible configurations of employment space is with a comprehensive marketing exercise.</p> <p>- Site owners will need to undertake the marketing exercise required if they wish to reduce the employment floorspace through development. The policy does not preclude re-provision of employment floorspace in mixed use development, this is supported.</p> <p>- Re-provision of the quantum of floorspace with an improvement in quality will be supported to increase the quantity and quality of employment.</p> <p>- Re-provision of the quantum of floorspace reconfigured for SMEs will be supported under the policy.</p> <p>- Support noted. The policy will be applied flexibly where viability issues are robustly demonstrated, however it is expected that where demand for employment space exists there should be deliverable and viable opportunities to re-provide employment floorspace.</p> <p>- Affordable business space is required under the small and independent business policy where necessary and feasible to retain existing businesses.</p> <p>- The strategy of the office and business development policy is to provide flexibility in re-provision in order to feasibly retain the overall quantum of space while allowing reconfiguration to encourage greater quantity and quality of employment. Existing light industrial small and independent businesses will have their unique characteristics protected under the small and independent business policy.</p> <p>- As above</p> <p>- Policy amended in PSV to promote the successful integration of homes and</p>
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<p>requires further detailed policy, so that their future operation is not disadvantaged by e.g. wind tunnels, reduced natural daylight and sunlight, reduced ceiling height, restricted access for deliveries, reduced business parking, all factors which may make both new and existing premises unviable.</p> <ul style="list-style-type: none"> - Suggests the proposed policy amendment is inadequate: "In certain circumstances there may be practical reasons why businesses cannot be accommodated within the completed development. In these instances a relocation strategy will be required to support existing businesses to relocate to premises where they can operate more efficiently and continue to thrive." - Suggests policy should state that the council aims where possible to accommodate existing businesses within development. As existing small retail units are protected from development, the same policy approach should apply to all small businesses. Policy should define what practical reasons are acceptable for not accommodating businesses (SMEs). It should define what the council considers an acceptable relocation strategy rather than leave this to developers. - Believe DM24 could be bolder in establishing the ambition for commercial growth. It should also reference the contribution to be made to London's Central Activities Zone. - Supports the revised wording of Policy DM24 to include protection for existing sui generis employment generating uses. - Supports the Council's view to protect B Use Classes in policy DM24 Office and Business Development, and shares the Council's view for mixed use neighbourhoods incorporating new types of business workspace across a range of sectors. - Objection is raised to the change in approach to the proposed policy provided by DM24 to provide the same level of protection to all employment sites across the London Borough of Southwark in that it is unduly restrictive. Concerned that the approach to apply the same level of protection to all existing employment sites in across the Borough, by requiring at least the same level of employment floorspace as existing in all cases, fails to take into account the nature of the existing employment uses, the number of jobs they provide and their relative importance to the local economy. Simply requiring provision of the same level of employment floorspace fails to take into account the fact that sites such of the Admiral Hyson Industrial Estate (which comprises a number of storage units in Class B8 use) currently provide relatively low levels of employment. - Suggests adding all B-class uses to avoid any doubt that they are protected by this policy. - Concerned that the wording of this policy is too onerous, and does not take into account either the nature of the existing uses on site, the quality of accommodation, or the planning benefits associated with a redevelopment scheme which may outweigh the loss of employment floorspace. • 	<p>employment space. Other NSP policies will also manage environmental conditions, servicing, parking and design of premises to ensure that when densities increase in areas then businesses can still be accommodated.</p> <ul style="list-style-type: none"> - New business relocation policy added with further detail to the PSV. - The accommodation of small and independent businesses is required under the small and independent businesses policy. - Area visions and site allocations in the NSP support the role of the Central Activities Zone. - Support noted. - Support noted. - Policy has been amended in the PSV to apply the policy to the Central Activities Zone, town centres, and opportunity areas and where specified in site allocations. The policy has been amended in the PSV to explicitly support increases in employment space. <p>The Admiral Hyson Estate has been designated as strategic protected industrial land in the PSV, supporting the intensification of industrial uses.</p> <ul style="list-style-type: none"> - The policy protects all B class uses. - The policy will be applied flexibly where viability issues are robustly demonstrated, however it is expected that where demand for employment space exists there should be deliverable and viable opportunities to re-provide employment floorspace.
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DM25 Railway Arches

Comment Summary	Council Response Summary
Light industrial uses should also be included in the policy which strengthens the local economy and provide an important component of a mixed local economy.	The policy supports B class uses including light industrial in railway arches.
Recommendation that the change of use to retail or offices should be discouraged.	The strategy for the use of railway arches is for a variety of land uses to support small businesses, shops, cultural, creative and community uses and restaurants
There are several railway arches in the residential parts of Dulwich and some have non-conforming users e.g. builders yards which impact on local resident amenity. Planning permission should only be granted for business uses (B Use Classes), retail (A Use Classes) and community facilities (D Use Classes) in railway arches as long as their operation does not impact adversely on adjacent residential properties and roads. Given that there are arches under railways in the south of the borough, not least in or adjacent to conservation areas, the wording needs to be more protective of residential amenity and conservation aspects.	Amenity and conservation impacts will be managed by amenity, design and conservation policies in the NSP.
Respondent recommends that this policy should be cross-referenced with Policy DM45 Low Line Walking Routes. Suggestion that uses permitted in the arches themselves, and spaces adjacent, will impact on the ultimate success of delivering the Low Line.	Policy has been amended in the PSV to prevent development from impeding low line walking routes.
As well as uses, detail is needed on design standards for development of arches in different 'local character areas' along the rail arches and need for more detailed guidance. The emerging Bankside Neighbourhood Plan sets out design guidance for rail arches within the Neighbourhood Area.	The NSP is the council's plan for the borough. Neighbourhood plans may set out additional design guidance.
Policy supported by respondent. Low Line projects need to be particularly supported because they bring together new business development in previously unused or poorly used space and an iconic improvement project linked to infrastructure. Arches can provide affordable space for small businesses. There should be acknowledgement of the scale of space available, the transition from light industry and storage, the existing tenants and rental pressures, the partnership with Network Rail, the transformation potential of the Low Line (including public realm, walking and cycling improvements) and any potential site allocations like at Old Kent Road.	Support noted. The low line is supported through an additional policy as well as through the addition of area visions and site allocations.
Respondent fully supports this policy. However, further clarity is requested in respect of the practical application where this could result in the loss and change of use of existing B Use Class floorspace which is resisted by Policy DM24 (subject to marketing). It is assumed that the specific details of this policy when applied to the arches adjacent to the Biscuit Factory, being part of the South East Bermondsey PIL, will be worked through as part of the PIL review identified in Policy DM23. Confirmation is requested from LBS that this will be addressed.	Support noted. The Biscuit Factory has been included in the site allocations and the required land uses are clarified.

Current railway arches with A Class licences have controlled licence hours i.e. units in Blenheim Grove. Respondent considers there is the opportunity for those units set further off the road to have extended licences-which may be more attractive to a wider range of businesses.	Noted. Licencing is not subject to planning policies such as the NSP.
The reference to cultural uses in the reasons section is welcomed by the respondent, but railway arches are only one of the types of spaces where cultural production facilities are under threat. Where there are explicit policy references to community facilities, designations need to be expanded to specifically include cultural facilities in order to allow for and protect the provision of cultural research, production and presentation space, alongside the more usual use classes. At present the system of uses does not allow for the special nature of these spaces, which are neither business nor 'community' in the usual sense.	Cultural uses will be protected by leisure, arts and culture, community uses, office and business development and small and independent businesses policies.

DM26 Small business units

Comment Summary	Council Response Summary
General amendment suggestions:	
Recommendation to add a definition of 'size' to the policy. 'Units of up to 100 sq. m will be considered small business units.' To be protected, units need to be clearly small business units. The latest draft London Central Activities Zone Supplementary guidance refers to research which shows that 80% of small businesses occupy units of less than 100 sqm. The respondent asks if the policy will be consistent with the currently adopted Core Strategy, which says 235 sqm.	The PSV now defines a small business as a business operating with 50 employees or less and an independent business as a business operating on more than 3 sites to ensure that there is a consistent definition to apply. This is reflective of the nature of small businesses in Southwark.
The ambition behind point 3 of the policy is supported but the respondent considers that feasibility and affordability are likely to be problematic and should be more closely defined as supporting space for small businesses is not the same as only having managed business space. Respondent suggests that new buildings lose flexibility in uses as fixed floor plates are not easily adaptable and recommends setting a condition to address this point to protect spaces which already accommodate SMEs.	The policy has been reworded in the PSV to clarify that the requirement of the policy is to retain small and independent businesses.
Representation is supportive of the Policy which seeks to promote affordable business space where existing SMEs are at risk of displacement from a development. Respondent considers that the provision of affordable business space should be encouraged where appropriate to assist in the regeneration of key areas of the borough and to form part of a wider offer of commercial and business premises in the borough. However the provision of affordable business space should be balanced against wider regeneration objectives and should not impact on the viability of the delivery of major schemes nor impact on the provision of infrastructure which will assist in delivering these objectives (e.g. the extension to the Bakerloo Line).	If a policy requirement impacts the viability of the scheme that will be considered when the planning application is assessed.

Respondent does not consider that providing fully fitted out small businesses units is practical or viable. It is their experience that small businesses often have unique and personal requirements and therefore, fitting out to shell and core with services that can be tapped into for ease would be more appropriate and viable. Providing fully fitted out units would also diminish the quantum of commercial space for small business due to viability.	The policy does not require space to be fully fitted out and other models can be considered when assessing planning applications if these are shown to be more suitable for small businesses.
Affordability of Small business units:	
Representation suggests that small business units should be protected and remain affordable on a case by case basis regardless of whether they are in regeneration areas.	Policy has been amended in the PSV to remove the restriction to regeneration areas.
Clarity is sought in respect of the definition of 'affordable' space for SMEs and whether or not this will be defined relative to location. Affordability is a relative concept, contingent upon location and any policy provision should take account of this fact. Moreover, respondent comments that office markets are dynamic; any attempt to define affordability should be sensitive to market changes.	Affordability will relate to the existing business that the space seeks to accommodate. The policy requires developers to establish whether that is feasible as part of retaining that business after redevelopment.
Respondent suggests that the policy should define affordability in the context of rent controls and lengths of lease agreements for SME's. Shops and business that have been in the area a long time run the risk of being priced out of the area as the respondent sees an increase of non-independent and non-local businesses expressing interest, suggesting a continuation of this trend. Controlled rent and length of agreement would provide security.	Affordability will relate to the existing business that the space seeks to accommodate, which might be achieved through fixed rent levels or the length of leases.
The policy would benefit from more explicit conditions on how demand for small business - and other protected uses - should be demonstrated as currently there is are no particular criteria.	The policy has been amended in the PSV to remove the reference to demand, it seeks to retain existing businesses where feasible.
Small businesses and small and affordable business space will particularly be important for all Low Line projects and this should be recognised in the policy.	Noted but the low line is supported elsewhere in the plan and does not need to be cross-referenced here.
Cultural provisions:	
Respondent is concerned over the loss of artist's studios in London and the availability of affordable space and considers that this is a part of a the wider property price problem which planners should support by providing inexpensive workspace as the respondent is concerned that not all of the requirements and vulnerability of the creative studio sector are sufficiently recognised.	Where artist studios are present in existing small and independent business space they will be protected by the policy.
The special protection extended to small business units needs to be explicitly extended to the provision of cultural production space, where the majority of creative and cultural development takes place, before artworks, performances, creative activities in the community and educational contexts reach their intended audiences.	Where cultural production space is present in existing small and independent business space they will be protected by the policy.

Amended policy DM26 Small business units

Comment Summary	Council Response Summary
<ul style="list-style-type: none"> - Suggests the requirement to provide a relocation strategy to the Council through Policy DM26 is overly complex and unsuitable. Such strategies are onerous for developers to provide and the benefits are not easily identifiable or quantifiable. - The Council has not set out within the New Southwark Plan how the strategies should be delivered and why it is appropriate for the Council to interfere in what is, in fact, a commercial consideration between parties. - Suggests that rather than seek to try and oblige developers and builders to assist relocation of existing businesses; encouragement should be given to work with Council operated initiatives to seek to support opportunities for new and existing businesses to flourish. Furthermore there should be greater encouragement for developers to deliver range of employment opportunities in schemes within the borough and especially in Regeneration Areas. - Suggests that this policy should be worded more clearly to confirm that small business units will only be sought where they are appropriate and not on all schemes. - Suggests it is inconsistent that Guidance on the criteria to be addressed by the relocation strategy is only provided in the revisions to the Old Kent Road AAP (Appendix 1). This Guidance must also be included in the NSP as a Fact Box to DM 26. - The guidance is welcomed, however, respondent suggests the following additions: The ethnicity of businesses and the social value this brings; The importance of market traders who should also be protected; The need for specialist advice and support; The necessity of a relocation package that includes removal expenses and legal fees; The importance of maintaining the existing site as an attractive trading environment; Collaboration with existing traders associations and not limiting collaboration to Council forums - Suggests there may be instances of small businesses choosing to relocate as part of their individual consolidation plans or business needs, rather than being displaced by development. Many small businesses prefer to come together and co-site for the benefit of economies of scale and purpose rather than be spread across a much wider range of sites. The supporting text should clarify that the need to re-provide existing businesses will not apply in this situation. 	<ul style="list-style-type: none"> - The requirement is justified by the need to ensure development does not adversely affect the operations of small businesses which, in turn, may adversely affect the local economy and employment. The requirement will only be triggered where a business affected by development is unable to secure suitable alternative premises unassisted. - The policy seeks to support businesses which are not party to redevelopment – such as leaseholders. - Noted. - New small business units will not be required on new schemes where the development is not replacing existing small business units if they are inappropriate. - Noted. This has been amended for the PSV. - Noted. - If a specific small business chooses to move from an existing premises this is not evidence there is no longer a need for that type of premises. However, the Council will take into consideration the need for small business space as part of any relevant development proposals and the appropriateness of doing so.

<ul style="list-style-type: none"> - Suggests that to provide more opportunities for the relocation of displaced small businesses as a consequence of development, set affordability requirements should be introduced (i.e. at least xx% of new small units / office space should be affordable). This would help existing displaced small businesses to be relocated in the completed development. Where appropriate, relocation plans should be subject to equality and diversity monitoring. - Suggests that specific space should be retained to protect existing cultural facilities. - Concerned about the council's ability to effectively implement the proposed policy amendment to the satisfaction of businesses. - Respondent suggested that policy needs to state explicitly what are "acceptable practical reasons when the needs of existing small businesses cannot be provided for in a development", and to identify determination mechanisms for what are acceptable and unacceptable reasons for displacing existing businesses, both those whose premises fall in a development site and those adjacent but adversely affected. - Respondent agrees that there is a good concrete commitment to secure the presence of small businesses within the Borough, the stated aim of the policy, in order to secure long-term longevity of existing businesses, by seeking to ensure there is no net loss of small business space. - Support recognition of the value of small business units in the New Southwark Plan. The Low Line is one important opportunity within the London Bridge area where existing small and independent businesses need protection and there are opportunities to attract new ones. Given the extent of the Low Line we believe it should be referenced in policy as a location where small and affordable business units will be important. - DM26 could be strengthened to protect existing SMEs vulnerable to displacement. The policy test should be strengthened to establish an expectation that relocation will only be considered in exceptional cases unless there is agreement with the existing 	<p>Noted. However, regards fixed affordability requirements the Council considers a one-size-fits-all approach is inappropriate in a complex and varied market.</p> <ul style="list-style-type: none"> - The Leisure and cultural uses policy states existing leisure, arts and cultural uses are retained or re-provided unless they are surplus to requirements. - Noted. - Noted. However, this would introduce an undue level of inflexibility to the policy. Attempts to be prescriptive many also fail to be sufficiently exhaustive. As such, it could be disadvantageous. - Noted. - The Low Line policy and the Railway Arches policy set out the types of uses appropriate within railway arches along the low line. - The policy has this presumption. - The PSV clarifies small business sizes in a fact box.
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<p>occupiers.</p> <ul style="list-style-type: none"> - Sub-section 2 of this policy encourages “a range of unit sizes” which seems to be at odds with the thrust of this policy which encourages small business units. It would also be more effective if, like Policy DM71 Small Shops, the Council define the size expectations further. - Suggests that requiring the retention of small business units and a relocation strategy should apply across the whole of the borough and not just apply to specific opportunity areas. 	<p>- Policy does not apply solely to opportunity areas.</p>
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DM27 Town and Local Centres

Comment Summary	Council Response Summary
Impact of town centre activities on amenities:	
<p>Recommendation to Add a point 3 to read: ‘The proposal will not require or encourage waste or waste bins on the street’ as the respondent considers that the presence of waste/waste bins can contribute negatively to the area as the smells from large commercial bins are threatening especially at night and creates the illusion of a neglected area – the opposite of what the respondent would want in town centres.</p>	<p>Waste policy requires waste to be managed on site and this policy also protects the amenity of the surrounding area.</p>
<p>Respondent requests the requirement for schemes less than 1,000sqm which are 400m or more from the nearest public toilet, to provide public toilets, if it is shown not to be technically, functionally and financially viable to do so, signage is provided for the nearest public toilets.</p>	<p>The threshold for providing public toilets has been set at a scale of development where this would be feasible. Signage to toilets while useful may lead to clutter and poor design if every unit 400m from a toilet has to provide it.</p>
<p>Respondent considers that the NSP should give priority to cultural uses over new housing in the town centre where such venues exist. However residents who already live in or very near the town & who do not feel themselves to be stakeholders in the night-time economy, need to have more say in how to prevent the night time visitors from causing problems for them. Respondent requests that the NSP explain how damage to existing amenity will be prevented and dealt with.</p>	<p>The policy encourages cultural uses in town centres while protecting the amenity of nearby occupiers. When assessing planning applications amenity will be considered under this policy as well as amenity, noise and other policies in the plan, with regard to any technical evidence submitted and mitigation measures proposed.</p>
General amendment suggestions:	
<p>Respondent suggests exploring further ways to support a more diverse retail offer and recommends doing this through the identification of locations where future retail will be supported and to restrict on additional food and drink uses as opposed to ‘functional’ shops.</p>	<p>Site allocations have been added to the NSP indicating where further retail uses will be provided to create a more diverse retail offer. Food and drink uses will form part of the retail offer and a attraction of these new destinations and will not be restricted except where they present amenity issues or would impact on public health.</p>

Add facilities for children's supervised play	The policy encourages community uses which might involve children's supervised play.
The respondent supports the principle of building a strong and diverse economy to transform South East London. Although town and local centres should be the main focus for new retail and other main town centre uses, the respondent considers that the policy as drafted is too prescriptive. It should recognise that new main town centre uses are important in helping to deliver regeneration objectives and create successful mixed use developments. This is consistent with the requirements of the NPPF to create sustainable forms of development. Respondent recommends the policy should be amended to reflect the acceptability of town centre uses outside defined centres where it delivers wider regeneration objectives with specific reference to development within AAP areas.	Site allocations have been added to the plan encouraging retail in line with the council's regeneration plans in AAP areas.
The specific inclusion of cultural uses in town and local centres is welcomed.	Support noted.
Respondent considers that any proposed Bermondsey Action Area Plan could be the most appropriate format for considering the relationship of the Blue to its wider hinterland and how this might enhance the vitality and viability of the Blue. This could involve an extension of the secondary frontages of the Blue and a consideration of the mix of uses that might be appropriately supported in the vicinity of the Blue that could complement and enhance its role as a key local centre.	The NSP no longer proposes a Bermondsey action area. An area vision and site allocations for Bermondsey have been added to the plan encouraging enhancement of the Blue.
Town centre boundaries/ Appendix 2 town centre boundaries:	
Recommendation to include West Dulwich/Park Hall shopping centre and Kingswood Estate shopping precinct as local centres.	These locations benefit from protected shopping frontages on the policies map. The areas have been reviewed and retail will continue to be protected but they do not meet the criteria to be designated as local centres.
Respondent supports the extension of the southern boundary for Peckham town centre to include the entire commercial frontage. Suggests to reconsideration of the exclusion of the Eagle Wharf site from the north of the town centre. The whole of the site is now being redesigned around the 'Library Square' and needs to be considered as a whole. Conversely, the respondent is unclear why the housing developments at Sumner House and Flaxyards are located inside the town centre boundary.	The proposed town centre boundary amendment at the north of Peckham has been removed in the PSV.
Appendix 2 of the New Southwark Plan proposes to reduce the extent of the Peckham Town Centre boundary to exclude a site that the respondent is looking at for potential residential re-development – The Whitten Timber Yard site. Respondent questions the reason for the reduction of the Town Centre boundary and asks if this is so that the Timber yard site becomes protected by policy 1.4 / emerging policy DM24? Or if it is still the Council's ambition to see this site redeveloped as per the Peckham Hill Street Conservation Area Appraisal (September 2012)?	The proposed town centre boundary amendment at the north of Peckham has been removed in the PSV.
Within town centres, including Bankside, commercial development on streets that do not currently have ground floor retail but which have been identified as benefiting from this in future should ensure that the potential for future changes are built in, e.g., through a framework that allows the replacement of walls by glazing and with a dual planning use.	Applications for ground floor retail units in town centres will be supported where they meet the requirements of the policy. This could extend to adaptable commercial units. However, planning applications will be assessed on the basis of the proposed land uses and design. The design quality policy requires active frontages which would facilitate a adaptability but

Supporting Southwark Street as a future retail spine needs also to address the technical difficulty of raised ground floors in current commercial buildings especially between Great Guildford Street and Redcross Way.	policy will not generally require buildings to be designed for uses other than those proposed.
More generally respondent proposes that the boundary for Walworth 'town centre' should run as far as Albany Road so as to encompass the retail parade at 73-91 Camberwell Rd.	Support noted, the NSP proposes the extension of the town centre boundary to Albany Road.
Town Centre designation:	
Representation considers that LB meets all these "high growth" criteria which includes: a high PTAL, capacity to accommodate high growth, likely to experience strategically significant levels of growth with strong demand for retail, leisure offices. Respondent recommends noting that the BBLB Opportunity area will deliver a density of new jobs second only to Kings Cross in the CAZ and the 5th highest of all Opportunity Areas.	London Bridge already falls within a town centre designation, which will be extended in the NSP to include a greater area on Bermondsey Street and Tower Bridge Road.
Respondent recommends amending the policy to further support small/and or independent retailers.	Small and independent businesses are protected by the small and independent business policy.
<p>Recommendation to amend the policy text as follows:</p> <p>a) In DM27.1 Table – move London Bridge into the Major Town Centre category</p> <p>b) In DM27.2 include in the list of acceptable town centre uses – "business uses; leisure; food and drink; night time economy uses"</p> <p>c) In DM27.2.5, after the word "toilets" – insert - "and make contributions (commensurate to the scale of the scheme), public realm, transport and town centre management improvements and affordable town centre space"</p> <p>d) Insert after DM27.2.5..."DM27.3 Southwark will promote town centre management schemes in all its town centres and work with business improvement districts (BIDS) where they are established. Southwark will encourage existing BIDS to support and advise on town centre management projects including the further establishment of BIDS.</p> <p>e) DM27.4 Southwark will seek, through conditions and planning obligations where appropriate and viable, the provision of affordable shop units suitable for small and independent retailers and service outlets to strengthen the retail offer, attractiveness and competitiveness of town centres"</p>	<p>- see above</p> <p>-These uses would come under town centre uses and are supported by the policy</p> <p>-Other policies in the NSP require development to improve transport and design. Affordable space may be required under the small shops policy, which has been added in the PSV, to retain existing businesses. Management arrangements may need to be secured by planning permissions to meet policy requirements but do not need to be sought for their own end.</p> <p>-The council works constructively with BIDs, this does not need to be tested when assessing a planning application.</p> <p>- A small shops policy has been added in the PSV which will require affordable business space where necessary and feasible to retain existing businesses.</p>
Respondent considers that given the scale of development proposed in the Old Kent Road that it should be defined in its entirety initially as a District Town Centre but potentially in the future as the area grows to be a Major Town Centre. Request to consider future	The NSP has been amended to propose the Old Kent Road as a major town centre.

<p>development aspirations when reviewing the town centre hierarchy and consideration has to be given to the potential for 20,000 new homes and 10,000 new jobs in the area contributing to the status of the area. The New Southwark Plan sets out the opportunity to consider Old Kent Road as potential new town centre. In order to ensure development is maximised bringing appropriate levels of new housing and commercial space to these areas it is imperative the Council gives these areas due consideration.</p> <p>Given the quantum of proposed development within Old Kent Road it is clear that the area meets the definition of both District Centres and possibly a Major Town Centres defined in the London Plan</p> <ul style="list-style-type: none"> • District Centres. Distributed more widely than the Metropolitan and Major centres, providing convenience goods and services for more local communities and accessible by public transport, walking and cycling. Typically they contain 10,000 – 50,000sqm of retail, leisure and service floorspace. Some District centres have developed specialist shopping functions. <p>There is clearly a need for a District Centre in the area which will service both existing and future needs and this may grow as development density increases to form a Major Centre in its own right.</p>	
<p>-Respondent fully supports the continued inclusion of the Blue as a key Local Centre within the New Southwark Plan.</p>	<p>Support noted.</p>

Comment Summary	Council Response Summary
<p>General policy comments:</p> <ul style="list-style-type: none"> - Recommendation to amend this policy to reflect the Mayor's Healthy Streets Policy and target in the Mayor's Transport Strategy for 80% of travel to be sustainable by 2040, respondent specifically suggests reducing private motor vehicle use by providing less car parking. - Respondent considers that defining areas of high footfall is challenging and suggests that perhaps refering those as Primary and Secondary Frontages would be more effective. - 2 Respondents support the amended policy DM27 and one specifically on the addition of public drinking fountains, public toilets and seating to the policy. - Recommendation to strengthen the policy to establish a priority for commercial, office, retail and leisure uses over residential uses. - Respondent suggests a more nuanced approach to development proposals including by recognizing the need for diversity in the retail and leisure offer (not just in the protection of existing amenities and character) and in supporting active frontages at more than ground level in Major Town Centres. - Respondent requests a 'proper' supermarket in the Elephant & Castle Area. <p>Comments on designations:</p> <ul style="list-style-type: none"> - Two respondents strongly support the designation of Old Kent Road as a Major Town Centre. One representation requests the provision of a rationale behind the proposed reallocation of Major Town Centre designation of Old Kent Road. The respondent considers that the 2015 Preferred Option draft Old Kent Road designation of Local Centre was considered to be a reflective hierarchy of centres and that development brought forward as part of the Old Kent Road Opportunity Area should not challenge this hierarchy to create four 'Major Town Centres' within Southwark. One Respondent disagrees with the elevation of Old Kent Road to a Major Town Centre as they consider that this implies the loss of the existing character and fails to recognize the high street structure and the mix of retail with industrial/ other workspaces that support the local economy. 	<ul style="list-style-type: none"> - Noted. However, these aims are supported throughout the NSP. - The NSP does introduce a distinction between primary and secondary frontages. - Noted - Residential uses are appropriate in town centres. - Noted. - The Council does not have evidence of need for a new supermarket in Elephant and Castle. There are several large supermarkets near Elephant and Castle. - The Council proposes elevating Old Kent Road to major town centre to reflect the Council's aspirations for the area which are to be fully established through an area action plan. - East Street has been incorporated into the Elephant and Castle and Walworth Road town

<ul style="list-style-type: none"> - Representation opposes to the deletion of East Street as a Local Centre. - Respondent supports the retention of London Bridge as a District Town Centre and welcomes the support of regeneration in the area, particularly in delivering civic and cultural uses. One respondent considers that the policy's definition of London Bridge as a Local Centre is not consistent with the London Bridge Plan for London Bridge to "become the retail core of Southwark" and does not adequately reflect its existing status as the retail floorspace associated with Borough High Street, London Bridge Station, More London, Hay's Galleria and Borough market alone already makes London Bridge a "Major Town Centre". Respondent disagrees that Elephant and Castle/Walworth Road, Canada Water and Peckham are the centres with the most capacity for growth as London Bridge is also an area which is a significant contributor to the night time economy and one of the few locations where further growth can be supported without any significant amenity issues. The respondent therefore considers that London Bridge warrants recognition in a revised DM27 as being the equivalent of a Town Centre and acknowledging its potential for growth. - The respondent is concerned that the proposed designation of Old Kent Road and Canada water as Major Centres and Heme Hill as a District Centre could give rise to conformity issues as the emerging evidence that will support the new London Plan indicates that these centres are currently not performing at this level. The respondent states that whilst centres can be reclassified where appropriate and following Town Centre 'health checks', changes to upper tier centres should be coordinated first through the London Plan. The forthcoming London Plan will review the existing town centre network and set out the classification for all larger Town Centres in London. - Representation considers that Canada Water in the long term may have the potential to function as a Major Town Centre but this needs to be supported by robust evidence considering the impact on other nearby centres and the wider Town Centre network, evidence of demand and capacity, and significant evolution of the centre to create a welcoming and identifiable Town Centre that gives access to a broad range of goods and services by walking, cycling and public transport. - Respondent suggests that within designated Town Centres, applications for commercial development/redevelopment that does not at that time have ground floor retail should ensure that the potential for future change is built in for e.g. through the inclusion of a structural framework that would allow the replacement of external walls by shop glazing 	<p>centre.</p> <ul style="list-style-type: none"> - Noted. London Bridge is within the Central Activities Zone and the Area Vision for London Bridge shares the respondent's aspiration for growth. - The Council is working closely with the GLA to ensure the town centre proposals are in conformity with the London Plan. - As above. Canada Water was designated a major town centre through the Core Strategy in 2011. - Noted.
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<p>and by applying for a dual planning use.</p> <ul style="list-style-type: none"> - Representation recommends including the definition of Town Centre uses in accordance with the NPPF framework for "main town uses" as follows: "Retail development (including warehouse hubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)." <p>Public toilets, public drinking fountains and public seating:</p> <ul style="list-style-type: none"> - Respondent has commented that in regards to the Canada Water Masterplan being delivered, it may not be possible to meet the requirement set out in part 2.5 and suggests amending the policy to include "where practical and desirable" to ensure that some flexibility is allowed for. - One respondent suggests that the threshold is 'unreasonably low' as this could include a relatively smaller office/hotel building. - Respondent considers that the provision of public toilets and drinking fountains should be considered in the context of a site's constraints and should have regard to existing circumstances where such facilities (toilet/drinking fountain...) are already provided. <p>Retention of 'A' Use Classes:</p> <ul style="list-style-type: none"> - Whilst the representation welcomes the retention of 'A' use classes, the respondent considers that a like-for-like replacement may not be appropriate in all cases. Specifically, the respondent considers that the wording as per the draft policy may restrict the opportunities for the redevelopment of existing large format retail stores and recommends the policy be amended to reflect that a like-for-like redevelopment of 'A' use classes may not be appropriate. - Respondent queries the retention/replacement of all 'A' class uses and questions, for example, whether A5 takeaway warrants this level of protection. The respondent considers that this protection is more appropriate for the preservation of Primary Shopping frontages rather than across the entire Town Centre as defined, as residential development for example, can be necessary to sustain and enhance the vitality and viability of Town Centres and such uses have an impact on residential amenity. 	<ul style="list-style-type: none"> - PSV includes definition/explanation of the town centre hierarchy. <p>- If the policy requirement is impractical or unfeasible this would be taken into account as a consideration at the application stage. No amendments are required.</p> <p>- As above.</p> <p>- As above.</p> <p>- The Council considers the policy is sufficiently flexible to adapt to alternative development proposals appropriately.</p> <p>- A5 uses is subject to different policy requirements.</p>
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<p>Respondent recommends sub-section 2.3 should therefore be further defined to restrict those proposals that may cause significant harm to the amenities of surrounding occupiers and provide further definition of what uses are considered suitable for ground floor uses.</p>	
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DM28 Development outside town centres

Comment Summary	Council Response Summary
<p>In accordance with the NPPF, draft Policy DM28 seeks to protect the vitality and viability of town and local centres from development located outside these centres. The respondent suggests that reference should be made to the relevant paragraphs of the NPPF and relevant guidance contained within the NPPG for certainty regarding the process of sequential and impact testing. In accordance with para 26 of the NPPF, the impact assessments should apply only to retail, office and leisure developments, not all development, as suggested in the draft Policy wording. No evidence has been provided to justify the threshold of 1,000sqm for impact assessments. It is noted that the NPPF's default threshold is set at 2,500sqm, but that scope is provided for local planning authorities to set a local threshold. In setting a locally appropriate threshold local authorities should consider the requirements of the NPPG. Further evidence should be provided to justify the lower set threshold or if this is unavailable then the default threshold of 2,500sqm as set out in the NPPF should be adopted.</p>	<p>Footnote added in PSV referring to the NPPF for clarity.</p> <p>The policy reasons explain that 1000sqm could equal or exceed the need for shopping floorspace in some areas and therefore could have a significant detrimental impact on the vitality and viability of nearby centres.</p>
<p>The policy is consistent with the requirements of the NPPF in terms of the requirement to demonstrate compliance with the sequential approach and provide an impact assessment for developments over 1,000 sq. m. The threshold for an assessment is considered reasonable.</p>	<p>Support noted.</p>
<p>The respondent considers that the policy does not recognise the importance of main town centre uses in helping to deliver regeneration objectives and create successful mixed use developments. In order to be consistent with the requirement to deliver sustainable developments, the respondent suggests that policy should promote or at least acknowledge the benefits of including commercial uses (of an appropriate scale) within residential</p>	<p>Site allocations have been added to the NSP setting out where town centre uses can help to create successful mixed use developments.</p> <p>Existing uses outside town centres are dealt with in a separate policy.</p>

<p>developments outside designated centres. The policy should also recognise the role and function of existing main town centre uses outside designated centres. Respondent suggests the policy should be explicit that impact assessments are only required for developments creating 1,000 sq. m of net additional floorspace. The policy should promote the inclusion of main town centre uses of an appropriate scale into new residential developments to serve new communities and create sustainable forms of development.</p>	<p>Policy wording is clear that the 1000 sqm threshold is a gross floorspace figure because replacement of existing floorspace may be of a different nature with different impacts.</p>
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DM29 Protected shopping frontages

Comment Summary	Council Response Summary
<p>Respondent is pleased to see that it is proposed to increase the proportion of protected shops in Peckham Town Centre up to 85%, and that ought to provide a positive environment for retail to thrive in Peckham.</p> <p>The respondent is concerned that this level of protection is going to be restricted to a limited part of the Town Centre rather than the whole area from Peckham Hill Street, through Rye Lane through to the start of Peckham Rye; and including those roads that cross them that have shopping areas including Peckham High Street. This approach ought to provide for a wider range of opportunities for the smaller retailer to be able to access affordable premises and ensure that the whole area can thrive with businesses that bring a positive perception of the area.</p>	<p>Support noted.</p> <p>The town centre in the NSP will continue to extend from Peckham Hill Street to Peckham Rye and include Peckham High Street.</p>
<p>Recommendation to amend the text add 'including CAZ secondary shopping frontage' to the last row in the table so that it reads 'Secondary shopping frontages including CAZ secondary shopping frontages' as the respondent considers that with the current wording it is unclear whether Bermondsey St as a proposed secondary shopping frontage in the CAZ would be subject to the 40% or 50% minimum. Respondent would prefer the 50% minimum in order to ensure that restaurants and cafes do not dominate the street.</p>	<p>From the left the table is divided initially into primary and secondary shopping frontages before mention of the CAZ under primary shopping frontages. As such the table is clear that for a secondary shopping frontage the 50% minimum will apply.</p>
<p>Representation considers that 85% is a very high figure for protected shopping frontage. As 5% A5 will be allowed, this only leave 10% for café's, restaurants, banks, dentists, opticians, and so on. While it is very important to protect the shopping frontage, we fear that such an unrealistic figure could be challenged and then all protection lost.</p>	<p>The figure for Peckham is higher than other areas but this is based on the existing makeup of the frontages and is an aspect of the character of that town centre.</p>
<p>Table 8 gives protection for retail for primary frontages as 85% and for secondary frontages as 50% in Peckham. The proposal is for the town centre to be split between secondary for Rye Lane from Choumert Rd southwards, and for the north side of the High Street and both sides of Hill Street to be secondary. This would encourage the loss of retail in the secondary frontages and lead to a reduction overall in retail in the town centre. I think the whole of the town centre should be classed as primary shopping frontages with appropriate high</p>	<p>Primary shopping frontages are designated where there is a higher proportion of shops in town centres. Secondary shopping frontages are areas where there are less A1 shop units within parades, generally at or less than 50% of the shopping frontage. The designation of secondary frontage will ensure the level of shops continues not to fall below 50%. Additionally policy P30 in the NSP requires that A class uses are retained or replaced in town centres to ensure the vitality and viability of the centre is maintained.</p>

protection.	
<p>Respondent suggests referencing new and emerging shopping frontages that are not currently included, e.g. Southwark St, Great Suffolk Street, the Low Line. Respondent also suggests that the plan would benefit from a retail strategy. Although the choice of occupiers rests with landowners, useful reference could be made to the example of a strategic approach being taken by landowners in 'Borough Market Environs' to ensure that the area retains its unique and special character.</p>	<p>The plan includes proposals for amendments to shopping frontages in an annex including those on Great Suffolk Street and Southwark Street. The council's assessment of shopping frontages did not identify any existing shopping frontages along the low line warranting designation.</p> <p>The town centre policies overall set out the council's strategy for encouraging retail uses across the borough.</p> <p>Area visions have been added to the plan for London Bridge and Bankside and the Borough which make reference to the importance of Borough Market.</p>
<p>Respondent is concerned that the increased focus on the protection of Class A1 uses in protected shopping frontages does not adequately reflect the NPPF's aim for town centres to support a range of uses. Non Class-A1 uses, such as restaurants, banks and cafés can help to enliven town centres and offer some alternative services to the local community.</p>	<p>Our evidence base shows that increases in retail spending capacity expected in the plan period will require the retention of existing A1 space in addition to the planned uplift in site allocations. Secondary frontages and other streets in town centres offer the opportunity to incorporate a range of town centre uses.</p>
<p>No evidence has been provided to justify the increase of the marketing period for the loss of Class A1 uses from 12 months to 18 months. Respondent considers that the increase of the marketing period is overly onerous and is not in line with the Government's ambition to encourage a range of viable uses to be developed within town centres.</p>	<p>The policy now increases the marketing period to two years in the PSV. Our evidence base shows that increases in retail spending capacity expected in the plan period will require the retention of existing A1 space in addition to the planned uplift in site allocations. The aim of the policy is to retain and where possible increase the quantum of retail space in town centres to meet future demand and promote improved shopping facilities. The council considers that in these locations the robust method to establish that there is no demand for existing or improved shopping space is with a comprehensive marketing exercise.</p>
<p>Protects shopping frontages, Table 8: The main drag of shops in Peckham is naturally extending south from Rye Lane onto Peckham Rye. Respondent believes this will continue to naturally do so, towards the line of East Dulwich Road, and is demonstrated by recent new business openings along that stretch both West and East of Peckham Common. Respondent believes this is a good thing as it provides an extension for amenities in the area for the local community and creates a small amount of employment. Thus the respondent has suggested that the line of 'Primary shopping frontage' should be pushed back to East Dulwich Road. Otherwise there is the risk of new businesses that do not need a High Street presence requesting permission. Along the stretch of road on the west side there are already a high number of estate agents, set amongst the other local shops/cafes/ restaurants etc. We do not need more.</p>	<p>The town centre boundary for Peckham is proposed to be extended slightly to the south to take into account the concentration of shops and services within the main shopping area of Peckham. There are a small number of existing shops in the frontage along Rye Lane to East Dulwich Road however the area is predominantly established residential in character.</p>

DM30 Shops outside centres

Comment Summary	Council Response Summary
Where A Use Class floorspace is no longer considered viable, respondent suggests that a 12 month rigorous marketing exercise should be sought, rather than 18 months. It is not clear why the 400m criteria has been introduced, this is considered to further the impact of units remaining vacant.	The policy now increases the marketing period to two years in the PSV. Local shops provide for day-to-day shopping needs and are also an important location for social interaction and fostering a sense of belonging in neighbourhoods. This has been observed in social research in Southwark. The council considers that the robust method to establish that there is no demand for existing or improved shopping space is with a comprehensive marketing exercise. The 400m criteria is included in the policy to maintain local shops where these are the only shop within walking distance for some residents.
Representation is supportive of the policy's objective to support shops and services outside town and local centres, close to where people live to meet 'day to day' needs of residents. This is consistent with the objective of the NPPF to create sustainable forms of development. It should however be extended to include reference to all 'main town centre uses'. The policy should acknowledge that commercial land uses help to support the viability of new residential development by providing a range of facilities required to foster and sustain new communities. This is particularly important in respect of larger scale regeneration (for example within AAP areas).	The policy protects existing shops rather than supporting town centre uses as part of regeneration more broadly. Site allocations have been added to the plan, setting out land use requirements in key regeneration areas.
Representation suggests that the policy should promote the inclusion of main town centre uses of an appropriate scale into new residential developments to serve new communities and create sustainable forms of development.	The policy protects existing shops rather than supporting town centre uses as part of regeneration more broadly. Site allocations have been added to the plan, setting out land use requirements in key regeneration areas.

DM31 Shop fronts

Comment Summary	Council Response Summary
Respondent comments that the protection of remaining historic shop front should be the primary aim of the policy, particularly in Peckham High Street. The respondent considers that the reference to internal security shutters is inappropriate in Rye Lane.	It is noted that there are frequent security shutters on Rye Lane but these do not contribute to creating a welcoming or attractive shopping environment.

DM32 Betting shops, pawnbrokers and pay day loan shops

Comment Summary	Council Response Summary
Representation considers that the reference to '10 on either side of the proposal' is not clear and requests that clarity is given on whether this includes premises on the other side of the road.	The policy will be applied on a linear shopping frontage and with 10 premises either side along the same frontage.
Two of the responses received suggested that the figure of 5% is too high and suggested that this should be reduced to 3% instead.	The policy restricts these uses to 5% of units within shopping frontages because at this level they will avoid becoming a frequent feature of shopping areas. There is no evidence that a more stringent restriction is necessary.

DM33 Hotels and other visitor accommodation

Comment Summary	Council Response Summary
Supports the policy position in relation to hotel development.	Noted.

DM34 Pubs

Comment Summary	Council Response Summary
Where a pub is no longer considered viable a 12 month rigorous marketing exercise should be sought, rather than 18 months.	The policy now increases the marketing period to two years in the PSV. Public houses play an important role in the community and have unique historic characteristics which should be recognised as key social, cultural and heritage assets within local neighbourhoods. Nationally, the rate of public house closure has risen steadily. In total the borough has lost a third of all public houses that were present in the borough ten years ago. The council considers that the robust method to establish that there is no demand for existing or improved pubs is with a comprehensive marketing exercise.
Respondent comments that the policy does not clarify in what form the registration of a pub as an Asset of Community Value will be a significant material consideration. As there is clear guidance on such matters, point 4 of this policy should be removed or clarified so that it is consistent with guidance.	National guidance will be referred to where relevant when assessing planning applications. The policy seeks to protect pubs in part for their community value, as such the registration as an asset will be relevant.
The policy should be amended to confirm that re-provision of pubs is acceptable to secure retention of the use in completed developments.	Pubs often make a contribution to local character and heritage in their existing form. The amended wording in the PSV allows for improved pubs to be provided but this will not be at the detriment of the historic environment.
Respondent strongly supports the moves towards stronger protection for pubs.	Support noted.

DM35 Access to employment and training

Comment Summary	Council Response Summary
Respondent queries whether point 3 should refer to 'new or improved' floorspace to ensure consistency with points 1 and 2?	
Respondent requests that an additional point should be included to confirm Southwark will work with Business Improvement Districts, business agencies and employment and training organisations to promote and provide access to job opportunities and training. Funding from s106 agreements and CIL and the areas they were derived from will be published and partnership schemes will be established to provide these valuable projects.	The council works constructively with BIDs, this does not need to be tested when assessing a planning application.
The delivery of employment opportunities both during the construction phase and within the final development should include reference to viability to ensure that developments are not stifled.	The policy will be applied flexibly and if employment opportunities were to impact on viability this would be taken into account. This would have to be robustly demonstrated.

The policy should demonstrate how this can be practically applied, particularly on major developments.	The council has an adopted policy which has been used to secure access to employment and training with successful examples.
Respondent suggests that the policy should be updated to include reference to viability as they consider that this policy is too onerous, and does not align with the wide aspiration of the regeneration area.	The policy will be applied flexibly and if employment opportunities were to impact on viability this would be taken into account. This would have to be robustly demonstrated.
Respondent considers that Point 4 should apply only to developments above a reasonable size. Generally, there should be more assurance to applicants about the nature, and governance, of the fund which this policy would create.	For applications that result in a loss of employment space the contribution sought will be proportionate to the scale of loss. The council has an adopted policy which has produced a fund that has been successfully governed to secure access to employment and training.
Respondent suggests there should be a financial contribution alternative towards LBS training and employment initiatives where the requirement for training and jobs for local people is not possible.	In exceptional circumstances where the requirement for training and job opportunities is not possible the policy will be applied flexibly and a financial contribution accepted.

DM36 Outdoor advertisements and signage

Comment Summary	Council Response Summary
Recommendation to amend Point 4 to make wider reference to other greening initiatives rather than solely trees given that there is an increasing number of innovative ways to green areas in addition to trees and these should also be similarly protected.	Biodiversity policy will protect other green infrastructure but trees are particularly susceptible to poorly designed or located signage where they may compete for space on streets.
Respondent has suggested that the policy should take into account the specific issues for Dulwich with its Conservation Areas and the remit of the Dulwich Estate for both commercial and enfranchised residential properties. Attention to enforcement should be included. There has been a proliferation of advertising on construction hoardings (especially on private dwelling hoardings) which is impacting the Dulwich environment with no evidence of enforcement.	The policy requires the consideration of heritage assets. Conservation areas in Dulwich are also protected by the conservation areas policy. The enforcement policy confirms that protecting heritage is a priority for enforcement.
The policy should encourage public art and good urban management messages where outdoor adverts are granted. Funds will be spent by the LPA or in BIDs by the BID company, or in kind by the applicant.	The policy does not preclude the delivery of public art. It is unclear from the representation what the basis for a fund would be or what it would be spent on.
The wording should be strengthened to protect against the nuisance and unsightliness of A-boards on footways.	A-boards on footways are often not subject to planning controls.

DM37 Broadband and telecommunications

Comment Summary	Council Response Summary
Recommendation to link point 4 and 5 by 'and' rather than 'or' to demonstrate that all points are required and applicable.	Policy wording has been amended in the PSV.
Due to concerns over the possible effects of the communication masts to children and young people, representation recommends no masts should be located within 100 metres of a school, nursery, or public library.	There is no evidence that this restriction is required. The policy requires masts to meet guidelines.

DM38 Healthy developments

Comment Summary	Council Response Summary
Request to Add to the policy: "This policy in supporting built indoor leisure facilities, excludes the Borough's designated open spaces and playing fields will not be permitted on designated SINC's."	SINC's are and open spaces are protected by their respective policies, there is no need for cross-reference.
Respondent comments that there is no mention here of children's quality play spaces. So, it could be that all the facilities coming forward for permission would be for adults.	Children's play space is required by the residential design quality policy.
Representation suggests that the council could consider more prescriptive requirements and set high standards that are commensurate with the size of the health challenge in the borough.	Health cuts across the NSP and is set as a key objective in the healthy active lifestyles strategic policy. Policies throughout the plan set standards that development must meet to help tackle health issues in the borough.
Active design should be explicitly mentioned under DM38. Developments should promote active day to day lifestyles. To achieve this, walking and cycling need to be encouraged through the very design of developments. Developments accompanied by behavioural change programmes that actively help people make healthier decisions about their travel should also be encouraged.	Active design is required by the design quality policy.
Developments should ensure that opportunities for walking, cycling and social interaction are given priority over the movement of motor vehicles.	Transport policies prioritise walking and cycling over private car travel, which should also encourage social interaction.
After DM38.2 respondent suggests inserting- "DM38.3 – Where "area visions" set out proposals for improving health and well - being, either through land use proposals, public realm improvements or people support programmes, (a need having been identified), Southwark will seek to support these aims in its development control decisions, area/neighbourhood plans and master plans – through conditions and s106/CIL contributions where appropriate and viable".	Area visions and site allocations have been added to the NSP and will be taken into account when assessing planning applications and considering what infrastructure it would be appropriate for development to fund to mitigate its impacts.

DM39 Leisure, arts and culture

Comment Summary	Council Response Summary
Better Bankside coordinates Avenue of Art, a potential mechanism for developers in Bankside to use to deliver the public art requirements of their developments – this could be referenced in the policy reasons.	There may be various public art initiatives across the borough throughout the plan period. These can be considered when assessing planning applications. The Avenue of Art has been promoted through the draft Bankside Neighbourhood Plan, which would become part of the development plan once adopted.
Respondent consider that the policy needs to also acknowledge the role of wider cultural production and presentation facilities in the creative and cultural life of the borough and its	Creative workspace will be protected under business space policies and this policy.

people, and to explicitly protect and encourage these spaces where they are under threat from regeneration.	
Representation comments that there is currently no guidance on how something being 'surplus to requirements' would be demonstrated. The uptake of arts and cultural space is often most closely dictated by affordability criteria, in relation to the non-commercial nature of much provision. In other sectors, for example Flexible Community Uses, a 18-month period is stated to demonstrate demand, but such criteria needs to be in relation to the affordability levels of specific space uses.	Policy has been amended in the PSVs so that a two year marketing period is required to demonstrate that a use is surplus to requirements.
After DM39.3 respondent suggests inserting – “DM39.4 – Southwark’s Central Activity Zone (Bankside, Borough, London Bridge and Elephant & Castle) contains a “Strategic Cultural Area” (SCA) running along the Thames. Along with the Mayor, local residents, businesses and the business improvement districts that cover this area – Southwark will seek to enhance the offer and environment of the SCA by: - Supporting public transport, walking, cycling and public realm improvements including performance and activity space - Developing and inward investing new attractions and by - Implementing the “Bankside, Borough, London Bridge Low Line” walking and cycling project; by using it to be a new link for the SCA and by promoting it as a new cultural attraction and destination in its own right”	Policy has been amended supporting arts and cultural venues of strategic significance in the strategic cultural area, which is the purpose of the designation. The Low Line project is supported by low line and railway arches policies, it does not need to be cross-referenced. Transport and design policies, site allocations and revisions seek improvements to transport and the public realm.

DM40 Flexible community uses

Comment Summary	Council Response Summary
Marketing:	
12 months marketing should be required to demonstrate there is no demand for community facilities, rather than 18 months.	Policy has been amended to require a two year marketing period. The council’s strategy is to retain community facilities or replace them with improved facilities. Planning applications and consultations suggest there is demand for D class and related sui generis space across the borough. The council considers that a two year marketing period is required to establish whether the site in its existing or an improved condition would be attractive to an occupier and robustly justify the loss of the use.
In accordance with London Plan, respondent requests that Policy DM40 is amended to allow an exemption to the requirement for a 18 month marketing exercise in scenarios where “the disposal of assets is part of an agreed programme of social infrastructure re-provision”.	Where social infrastructure providers are disposing of assets as part of a general programme the marketing exercise will establish whether an alternative community use could be accommodated. In exceptional circumstances social infrastructure providers could demonstrate that the facility will be retained through re-provision off-site where this would be secured through the grant of planning permission.

Amendment suggestions:	
DM40.2 –Respondent recommends rewording the policy to: this “Development must retain existing community facilities except where there is no demand. This needs to be demonstrated by a rigorous marketing exercise over an 18 month period prior to a planning application.”	Policy wording has been amended in the PSV.
Respondent requests that clarity is provided as to what defines a community use vs a health use and recommends that community uses must be defined by a use class to know what is being covered.	Policy wording had been amended in the PSV to mention use classes and a fact box has been added.
Respondent comments that faced with financial pressures, the NHS requires flexibility in its estate. In particular, the capital receipts and revenue savings generated from the disposal of unneeded or unsuitable sites and properties. It is important to note that there are separate, rigorous testing and approval processes employed by NHS commissioners to identify unneeded and unsuitable healthcare facilities.	Where social infrastructure providers are disposing of assets as part of a general programme the marketing exercise will establish whether an alternative community use could be accommodated. In exceptional circumstances social infrastructure providers could demonstrate that the facility will be retained through re-provision off-site where this would be secured through the grant of planning permission.
Respondent recommends that where it has sometimes proven difficult to find community and cultural uses that are viable and valued by the community, useful coordination could be made with existing organisations in the area such as South Bank and Bankside Cultural Quarter?	Where a community facility is marketed local organisations could contact the sellers or recommend the listing to suitable potential occupiers. This does not require a policy.

DM41 Hot food takeaways

Comment Summary	Council Response Summary
Policy must take account of schools which are outside the borough (e.g. London Nautical School)	The policy restricts hot food takeaways near any secondary school which would include those within 400m but outside of the borough.
Respondent questions the reference to “10 on either side of the proposal” as this does not include premises on the other side of the road and asks whether this was the intended.	This policy requirement does not include premises on the other side of the road but the overall concentration will be restricted as both sides will have no more than 1 takeaway in 21 premises.
Takeaway exclusion zones should include all schools, state and private.	The policy restricts hot food takeaways near any secondary school which would include state and private schools.
Respondent asks the council to consider strengthening the policy to only allow delivery service in locations where delivery vehicles can be parked on-site.	Servicing is dealt with under transport policies.
Respondent considers that Policy DM41 should be amended to require that grease traps are installed for all new catering establishments. These traps must be regularly cleaned and	Policy has been amended in the PSV requiring grease traps.

maintained.	
Given the amenity provided to residents and businesses by the availability of hot food outlets, the implications of this policy would be disproportionate to its underlying aims and contrary to the public interest. Planning and development control are not an appropriate remedy to obesity.	Childhood obesity is a key health issue in Southwark and such policies have been found sound in local plan examinations in other authorities and in the Peckham and Nunhead AAP.
Respondent would like to ensure people can buy fresh food so that they have a choice and suggests running a Hot and Healthy apprentice scheme.	Southwark is supporting the healthier catering commitment. The healthy developments policy has been amended to require development to increase the convenience of healthy food.

DM42 Public transport

Comment Summary	Council Response Summary
Recommendation to press TfL for better (and more frequent) public transport options in the low PTAL areas of Dulwich.	Noted. The council engages in continual engagement to deliver appropriate public transport services with TfL and other public transport stakeholder.
Respondent asks to clarify if this means that every development has to demonstrate capacity in the public network, or is there a minimum limit of housing units?	The policy will be applied proportionately to development proposals. The council publishes validation requirements for planning applications and further guidance as needed.
Bullet point 1 or 3 should be extended to state that development would be expected to fund public transport capacity enhancements, particularly bus services, where there is a capacity issue, in line with London Plan policy 6.1 A c.	Point 3 of the policy is amended in the PSV.
There is no mention of development ideally being located near public transport hubs, as was included in the previous version (Draft Options); respondent suggests this is reinstated.	By requiring development to demonstrate sufficient capacity for public transport, larger scale development will be directed to public transport hubs. Site allocations have been added to the NSP to bring forward significant regeneration around public transport hubs.
The Policies should be updated to reflect changes to public transport, in particular the proposed extension of the Bakerloo Line and the positive impacts this will have on accessibility.	The policy will be applied flexibly where public transport improvements are secured, taking these into account.
How does one demonstrate that existing public transport has the capacity to support new and nearby development (both residential and commercial). How will these studies be conducted and regulated? What constitutes a 'enough capacity'.	The council produces detailed guidance on the information required in support of planning applications, including transport assessments.

DM43 Highways impacts

Comment Summary	Council Response Summary
DM43.3 respondent suggests inserting "or any similar road or transport network" after "the Transport for London Road Network"	This policy already covers all types of roads.
DM43.6 – Respondent recommends deleting "vulnerable" and insert "all" so that it reads "... to reduce danger to all road users."	Vulnerable users will require more consideration to be protected from construction traffic. By reducing the danger to vulnerable users other road users will be protected.
In bullet point 6, after "... accomplished safely", respondent suggests inserting "using vehicles which minimise danger to vulnerable road users and"	Planning controls are unable to dictate what types of vehicles are being used within the borough.
Recommendation to allow for parking and/or car drop-off points at appropriate locations for older, disabled and less mobile residents.	This would be contrary to the council's Kerbside Strategy which aims to reduce kerbside parking.
The policy specifically mentions a requirement for off-street servicing 'within large development sites' (bullet 5), which is slightly contradictory to DM10 which appears to have the same requirement but for all sizes of developments.	The design quality policy refers to adequate servicing within the footprint of the building and site. This is not contradictory to this policy which refers to vehicle servicing and delivery and acknowledges that smaller sites may not be able to accommodate a servicing area for vehicles to manoeuvre.
Representation suggests bullet 3 could be strengthened to include mention of 'the cycle network' in terms of preventing/mitigating adverse impacts of development	The cycling policy requires development adjacent to the cycle network to support it.
Respondent recommends the requirement to provide delivery and service plans, construction management plans and travel plans where appropriate, to demonstrate compliance with this policy, should be included, ideally in the policy wording itself. This is in line with London Plan policy 6.3 E.	The council produces detailed guidance on the information required in support of planning applications, including servicing, construction management and travel plans.
Request to cross reference with the Street Types matrix developed in response to the Road Task Force Report.	The street types matrix encourages the consideration of both the movement and place function of different types of roads. The NSP contains both design and transport policies to consider both aspects.
Respondent would welcome more specific guidance on construction impacts	The council produces detailed guidance on the information required in support of planning applications, including construction management plans.

<p>The respondent would strongly endorse the inclusion of a requirement for developers to demonstrate how the new development could make it easier for occupiers (and where possible other neighbours) to minimise the number of motorised trips made through:</p> <ul style="list-style-type: none"> • Shared facilities for waste storage • Shared servicing • Measures to encourage shared deliveries, e.g. use of a nearby freight consolidation site and 'last mile' service. 	<p>The council has been investigating how to reduce trips through consolidation, drop of zones, concierge etc. and may produce further detailed guidance in the future. The policy sets the criteria for planning applications to be assessed against.</p>
<p>Respondent has asked that the link between this policy and DM60 is made explicit.</p>	<p>Planning applications will be assessed against policies from the whole NSP where there are relevant. It is not necessary to cross-reference between them.</p>
<p>Respondent has asked to clarify which routes are currently authorised for construction vehicle traffic travelling to destinations outside the borough e.g Southwark Bridge Road being the route for City related traffic.</p>	<p>Routes for construction management will be determined through construction management plans. The road network is not segregated to exclude construction traffic entirely from some roads.</p>
<p>After DM43.2, respondent suggests inserting - ..." and any schemes for improving walking and cycle, including road calming and crossings. In any case, demonstrate the road network around the proposed scheme is safe and accessible for pedestrians and cyclists."</p>	<p>Cycling and walking policies already require development to deliver the pedestrian and cycle network. Where this has implications for road network capacity that should be reflected in information in support of planning applications.</p>
<p>Respondent proposes changes as follows:</p> <ol style="list-style-type: none"> 1. Minimises [begin strikethrough] Minimises the demand for [end strikethrough] private motor traffic, [begin suggested text] particularly during peak hours; [end suggested text] 2. Demonstrates a net reduction in demand for private motor traffic trips on [begin strikethrough] that [end strikethrough] the road network [begin strikethrough] has sufficient capacity to support any increase in resulting trips, taking into account the cumulative impact of [end strikethrough] through freeing up adjoining or nearby development; 3. Prevents or mitigates adverse impacts on the local road network, [begin suggested text] the cycle route network, [end suggested text] the bus network and the Transport for London Road Network to ensure safe and efficient operation, [begin suggested text] while facilitating greater use of sustainable travel modes; [end suggested text] 4. Ensures safe, efficient delivery and servicing, and minimises the number of motor vehicle trips required, [begin suggested text] particularly during peak hours; [end suggested text] 5. Incorporates delivery and servicing within large development sites and not on the public highway, [begin suggested text] while making full use of opportunities to share delivery and 	<ul style="list-style-type: none"> - The impact of the development on peak hour traffic is already brought into consideration by addressing road capacity. - It is not clear how a net reduction in trips would be possible from all development. - Walking, cycling and public transport policies already encourage sustainable transport modes. - The impact of the development on peak hour traffic is already brought into consideration by addressing road capacity. - Incorporating delivery and servicing within large sites will create opportunities for shared delivery and servicing.

servicing with nearby buildings; [begin suggested text]	
6. Demonstrates that the construction phase of development can be accomplished safely, minimising vehicle movements with the movement and operational requirements of vehicles strictly controlled to [begin strikethrough] reduce [end strikethrough] [begin suggested text] minimise [begin suggested text] danger to vulnerable road users, [begin suggested text] particularly during peak hours, and ensuring no adverse impacts on the cycle route network or walking routes.' [end suggested text]	- The impact of the development on peak hour traffic is already brought into consideration by addressing road capacity. Walking, cycling and public transport policies already encourage sustainable transport modes.
Respondent requests that it should be made clear that consent will not be granted for development which would have an adverse impact on the bus network or the "safe and efficient" operation of the TfL or local road networks.	Support noted. The policy already protects the TfL road and bus networks.

DM44 Walking

Comment Summary	Council Response Summary
General amendment suggestions:	
DM44.2 – Respondent suggest the addition of the following clarification at the end: “Exemplary facilities for pedestrians are characterised by features such as wide footways, trees and other greening initiatives, absence of street clutter, active uses at ground level, seating and public toilets and, where vehicular traffic is permitted, speed restrictions of 20mph maximum.”	Policy wording amended in PSV requiring the provision of footways, routes and public realm that enable access through development site and adjoining areas and the thoughtful positioning of street furniture. Public toilets and seating are required by the town and local centres policy. Every road that Southwark controls has a speed limit of 20mph.
DM44.3 – Respondent suggests adding an additional sentence to the end of this item as follows: “All options must be considered, including (without limitation) shared surface use.”	Add to reasons.
The adopted policies map should designate Wells Way as a Green Route, with only public transport, cycling and walking allowed. The adopted policies map should show the Southwark Spine passing along Wells Way and not trisecting the park. The adopted policies map should show a desired segregated cycle lane along Albany Road and linking Burgess Park with Bowyer Place junction with Camberwell Road.	Cycle routes are not shown on the policies map. The council prepares proposals for cycle routes separately in consultation with residents and other stakeholders and in line with the Southwark Cycling Strategy.
Respondent suggest the following amendments to policy DM44 [square brackets = new text]: 2. Provides exemplary facilities for pedestrians within the development and [links to] the surrounding area, ensuring access through development sites, [in accordance with the latest Streetscape Design];	Policy wording amended in PSV.
D44.1 Respondent suggests amending to: “Enhances the borough’s walking networks by improving permeability and connectivity to surrounding areas.”	The policy requires development to help deliver an enhanced network of walking routes across Southwark. The detailed features of walking routes suggested by the respondent can

<p>As well as reference to walking networks it would be helpful to consider:</p> <ul style="list-style-type: none"> • Crossings (new or re-designed) • Junction redesign to enable narrow crossing points to be widened and reduce vehicle speeds • Footway widening to increase capacity. <p>Respondent would also strongly urge that developers should be obliged to consider the potential conflict between delivery and servicing needs and walking routes. This could include enabling time restrictions and/ or making sure the design is compatible with night time deliveries.</p>	<p>be considered in the assessment of planning applications. The highways impacts policy requires servicing and other traffic to ensure safe operation of the road network, which would involve avoiding conflict with walking routes.</p>
<p>Change to:</p> <ol style="list-style-type: none"> 1. Enhances the [begin suggested text] quality and permeability [end suggested text] of the borough's walking networks; 2. Provides exemplary facilities for pedestrians within the development and the surrounding area, [begin suggested text] including home zones where appropriate, ensuring excellent access through development sites; [end suggested text] 	<ul style="list-style-type: none"> - Policy wording amended in PSV to the same effect - Every road that Southwark controls has a speed limit of 20mph
<p>Representation recommends working with the Dulwich Estate to identify the potential walking links between different parts of Dulwich across playing fields and MoL areas e.g. Burbage Road and Dulwich Village around the back of the Herne Hill Velodrome.</p>	<p>Noted. The council works with stakeholders across the borough to deliver an improved transport network.</p>

DM45 Low Line walking routes

Comment Summary	Council Response Summary
<p>General amendment suggestions:</p>	
<p>Respondent recommends the addition of a fourth indicative low line route: 'The Riverwalk along the Thames and walking routes connecting it southwards including the route from Potters Field Park through St Johns Horsleydown and Tanner St Park to St Mary Magdalen churchyard.'</p>	<p>The River Thames and walking policies give support to this route. The low line routes are found alongside railway viaducts.</p>
<p>Reference should be made to creating a clear identity for the Low Line routes in terms of their design.</p>	<p>Design policies will be applied to ensure that proposals for the low line respond positively to local character including the opportunities provided by the historic railway viaducts and adjacent spaces.</p>
<p>Respondent suggest the inclusion of the Bussey Building to the third indicative low line: <ul style="list-style-type: none"> • Rye Lane to Old Kent Road, including the Peckham Coal Line and the Bussey path. </p>	<p>The NSP supports delivery of the Low Line / Coal Line projects in this vicinity. Detailed proposals for route sections will need to be assessed as they come forward, which might include the Bussey Path if feasible.</p>
<p>a) After the word "routes" in DM 45 para one, insert: "(and in some cases cycling as well)"</p>	<ul style="list-style-type: none"> - Policy amended in PSV to low line routes rather than low line walking routes.

<p>and after the words “across the Borough” insert: “These are strategic transport projects and initiatives”.</p> <p>b) After DM45. “Supported” – Respondent suggests inserting: “a) Waterloo to London Bridge to Rotherhithe New Road”.</p> <p>c) DM45.1 – Low Line projects will be promoted and developed as “integrated sustainable transport, open space, leisure, cultural and business opportunities” illustrating how creative design, use and investment can provide local community improvements as well as new cultural destinations and better use of valued historical infrastructure.”</p> <p>d) Delete the 2nd Para under the “Reasons” heading and replace with: “The Low Line routes being studied for investment and implementation are set out in Figure 6 p 53. They are: a) Waterloo to London Bridge to Rotherhithe New Road ...”.</p>	<ul style="list-style-type: none"> - This section of the Low Line is supported by the policy - The low line policy will create the opportunity for multifunctional spaces alongside the railway arches policy. Site allocations on the low line also include requirements to create spaces and routes along the low line. - The NSP seeks to deliver the low line routes listed.
<p>It is suggested that the wording of Policy DM45 be amended to recognise the importance of promoting the Low Line without compromising the economic growth of the arches:</p> <p>“Development will be expected to not compromise the operation of uses in the adjacent railway viaduct arches and should allow for continued access to the arches by serving and refuse vehicles whilst maintaining safe pedestrian access.”</p>	<p>Adjacent uses and their existing serving arrangements will be considered when assessing planning applications but the aim of the policy is to support an ambitious project to reopen walking routes along the railway viaducts.</p>
<p>Respondent suggests that this policy should cross reference DM25 Railway Arches – as both policies taken together have greater potential to deliver the ambition of the Low Line.</p> <p>It is also worth noting that different sections of the Low Line across the Borough will have different local characteristics and will need different approaches to unlocking the opportunity for a walking route, this we feel needs recognition within the policy</p>	<p>Both policies will be applied when assessing planning applications, there is no need to include a cross-reference in the policy.</p> <p>Design policies will ensure that the character of different parts of the borough is considered when assessing planning applications for Low Line proposals.</p>

DM46 Cycling

Comment Summary	Council Response Summary
<p>General amendment suggestions:</p> <p>Respondent considers that DM46.3 and 46.4 could be reworded to read:</p> <p>3. Enables the growth in cycling through the generous provision of cycle parking for building users and visitors in accordance with Appendix 6. The provision of associated showers and changing facilities must be proportionate to the scale of cycle parking provided; and</p> <p>4. Provides cycle parking designed to best practice standards which is convenient, secure, adequately lit, weatherproof and fully accessible to all, including disabled people and the mobility impaired; and”</p>	<p>Policy wording amended in PSV to include ‘and’ between clauses.</p> <p>The policy sets the criteria for good quality cycle parking so planning applications can be assessed without additional reference to best practice.</p>

<p>Respondent suggest amending the policy as below: [square brackets = new text]:</p> <p>1. Ensures the delivery of the Southwark cycling spine and wider route network, as set out on the updated adopted policies map. All sites [and new development] on or adjacent to the route network must [safeguard], support and integrate into the network;</p>	<p>The policy requires development to ensure delivery of the network so the additional wording is unnecessary.</p>
<p>Respondent suggests developing the policy further by including references to some of the strategic measures included the Cycling Strategy notably:</p> <ul style="list-style-type: none"> • Designing out speeds of more than 20 mph through effective street and public realm design (DM46.1) • Filtered permeability and introducing cycle contraflows on one way streets (DM46.2) 	<p>Every road that Southwark controls has a speed limit of 20mph, this will need to be taken into account when assessing planning applications. Other proposals to modify the function of the council's road network will be consulted on separately from the NSP.</p>
<p>Respondent would endorse an element of 'future proofing' against either higher levels of cycling than predicted or changing working patterns leading to a greater density of employees per m2. This could be by obliging developers to make provision for flexible space that could be converted into additional cycle parking spaces.</p>	<p>The cycling standards in the NSP are ambitious but deliverable. Requiring additional space might interfere with the efficient use of land and buildings for development. It is not clear what the flexible space would be used for if not needed for cycle parking.</p>
<p>Representation suggests that specific mention of Cycle Superhighways and Quietways could be made alongside the Southwark Spine in bullet 1, in line with London Plan policy 6.9</p> <p>Bullet 3 mentions 'best practice standards' so the London Cycle Design Standards should be referenced, in line with London Plan policy 6.9.</p>	<p>The Southwark Spine is mentioned as a particular local priority but the policy supports the delivery of the wider network. Cycle superhighways and quietways are already given prominence in the London Plan.</p>
<p>Enforcement strategies/actions could be stated more clearly.</p>	<p>It is not clear what enforcement is referred to, this may be outside planning control.</p>
<p>Respondent suggests the addition that: "The council supports the provision of physically protected space for cycling along major cycling routes such as the Borough's cycling superhighways, Southwark Spine and busy roads and will require space to be provided for this in new developments. The council recognises that the majority of cycling deaths happen at junctions. Therefore any new developments at junctions must provide space for protected left hand turns for cycles and right-hand turn provision must match Go Dutch standards."</p>	<p>The policy requires delivery of the cycle network and the highways impacts policy requires consideration of road safety. Detailed matters of junction design can be considered when assessing planning applications.</p>
<p>In terms of wording, the respondent notes that DM46 does not currently directly refer to Appendix 6 on Cycle and car parking standards and states It would be helpful to include more guidance on cycle hire (perhaps also detailed in Appendix 6).</p>	<p>The policy refers to the cycle parking standards in the annex.</p>
<p>Respondent considers the requirement that developers provide a free two year cycle hub for per dwelling where a Docking Station is within 400m is both unreasonable, unnecessary and have a detrimental financial impact on development schemes.</p>	<p>The policy will be applied flexibly where the cost of cycle hobs would impact on development viability. This must be robustly demonstrated.</p>
<p>Respondent is requesting that a Local Development Order is made to simplify the provision of cycle parking sheds in front gardens, for which planning permission is currently required.</p>	<p>Noted. The council will consider the proposal but this would be outside of local plan preparation.</p>

Respondent considers that to ensure no impact on design, the policy should encourage innovative and user friendly cycle parking stacking solutions. Ultimately a better use of floorspace supports the Council's aspiration to ensure the effective use of brownfield land.	Noted. The merits of innovative solutions can be considered when assessing planning applications.
Representation considers that this policy, notably para 1, would appear to endanger household and residential amenity, eg with regard to cross-overs and parking opportunities, and should be modified to recognise the interests of frontages and other local residents.	The NSP prioritises cycling and other healthy and environmentally sustainable modes of transport. The detailed design of cycling routes will need to consider safety as regards existing crossovers.
Adopted policies map:	
Recommendation to amend the adopted policies map to include the adopted cycle routes as respondent considers that it is difficult for the public to understand these lines on the cycle route map without a ny street indication.	Cycle routes are not shown on the policies map. The council prepares proposals for cycle routes separately in consultation with residents and other stakeholders and in line with the Southwark Cycling Strategy.
The adopted policies map should show a desired segregated cycle lane along Albany Road and linking Burgess Park with Bowyer Place junction with Camberwell Road.	Cycle routes are not shown on the policies map. The council prepares proposals for cycle routes separately in consultation with residents and other stakeholders and in line with the Southwark Cycling Strategy.

DM47 Infrastructure improvements

Comment Summary	Council Response Summary
Respondent suggests the inclusion of "one or more" after "implementation of" so that it reads "implementation of one or more of the following strategic transport projects and initiatives:"	The suggested wording would not add clarity to the policy.
DM47.3 There is a reference to the "adopted cycle route network". Respondent suggests clarification is needed regarding "adopted" – i.e. by whom?	Adopted refers to the recognised routes that are adopted by the local highway authority and by TfL. The term does not require further elaboration here in order to understand the policy.
Respondent proposes amending this policy to describe and define the kind and level of support that a development will need to provide to the infrastructure improvements for planning permission to be granted and further that the policy states that such support will not be acceptable in place of meeting policy requirements DM1 Affordable Homes and DM2 New Family homes.	Both the provision of necessary infrastructure and affordable and family homes are required by the NSP. The CIL and section 106 policy sets out how development will contribute financially to infrastructure projects. On a site specific basis development may also need to directly provide land or components of the transport infrastructure network. This will be determined when planning applications are assessed.
Planning permission will be granted for development that supports the implementation of the following strategic transport projects and initiatives [and development will not be permitted that would prejudice their implementation]:	Policy amended in the PSV to development 'must'.
Suggestion to add The Low Line (Waterloo to London Bridge, Blackfriars Road to Elephant and Castle), Bankside Urban Forest (a long term strategy to improve connections between the riverside) and Elephant and Castle. None of the strategic projects listed address the predicted increase in freight and servicing traffic.	The Low Line benefits from a separate policy. Improvements to walking and cycling routes in Bankside are supported by the area vision for Bankside and the Borough. Noted that strategic projects may need to more directly address freight and servicing in the future.

Respondent also suggest the addition of “freight consolidation sites”.	Freight consolidation sites may assist the functioning of the road network but proposals have not been sufficiently worked up to require their delivery in the NSP.
Recommendation to add: “Bus priority measures [suggested additional text - including zero-emission bus routes].”	It is not clear how development would support the roll-out of zero-emission vehicles and how this would be considered when assessing planning applications.
The 3 Low Line projects are strategic “cross Borough” multipurpose infrastructure projects and the respondent suggests that this should be included in DM47. The proposed London Bridge Esplanade project is strategic because it would implement the Thames Walk in this part of London and would increase access along the Thames and support improved river transport	The low line benefits from a separate policy. A London Bridge vision has been added to the plan which requires development to enhance the Thames Path in a safe and sustainable way.
After DM 47.9, the respondent suggests inserting – “B. Area Visions for Southwark’s neighbourhoods that have been consulted on and agreed will have the opportunity to put forward up to 6 additional infrastructure projects. 25% of CIL revenues and 100% of s106 agreements will be allocated to these identified projects for funding support.	The council has an established procedure for spending the local portion of CIL through community councils.
Respondent considers reference to Camberwell and Peckham should be omitted from bullet 1 but instead mention could be made of a potential reopened Camberwell station.	Policy amended in the PSV.
Respondent suggests that Bullet 6 should be extended to include other bus infrastructure such as bus stands. New river piers/improvements to existing river piers should be included in the list together with pump priming of new and improved Riverbus services.	The public transport policy requires improvements to services which might include small scale infrastructure such as bus stands. Proposals have not been developed for improved Thames clipper that are necessary to facilitate development in the borough.
Representation has suggested the addition of ‘Delivery of street types for London. Delivery of London cycle hire, initially throughout the Urban Density Zone and all of Canada Water/ Rotherhithe peninsula (Figure 3).	Street types for London are not a transport infrastructure scheme. Cycle hire roll-out is supported by the cycling policy.
Respondent considers there has been no consideration of alternatives which encourage more mixed-use live-work environments and which build on rather than eradicate the existing qualities and diversity of London’s neighbourhoods.	Noted. The policy requires the delivery of strategic transport projects that have been the explored in terms of their benefits and feasibility.

DM48 Car parking

Comment Summary	Council Response Summary
General amendment suggestions:	
Respondent would welcome greater clarity on the relative strength of this DM policy in relation to other strategic policy areas, such as the need to build more affordable homes.	All relevant policies in the NSP will apply when assessing planning applications, weight will be given to different policies by decision makers.
Recommendation to extend Bullet 1.3 to require developments to fund CPZ expansions where none exist and where there is the potential for overspill on-street car parking.	The planning policy will be applied flexibly where it is not possible to accommodate parking on site. A parking survey would be required with such applications to demonstrate what the parking stress levels are.
Respondent suggests it might be clearer if the wording in bullet 1.4 is relocated to under bullet 1.6, as both relate to town centre car parking.	The policy has been amended in the PSV to separate residential from town centre parking.
As per comments relating to policy DM10, additional wording under DM48 could seek to encourage car parking to be hidden under-podium or within a basement.	The suggested measures may be necessary to ensure that a development achieves an adequate standard of design, this can be assessed under the design policies in the NSP.
Respondent suggests that it would be helpful, for clarity and avoidance of doubt, to state what measurement the floorspace relates to i.e. gross external area (GEA) for cycle parking standards and gross internal area (GIA) for car parking standards, as per the London Plan.	The parking standards has been updated for clarity in the PSV.
It is suggested that car parking standards are brought in line with the London Plan and include the aim that 'all developments in areas of good public transport accessibility should aim for significantly less than 1 space per unit, and towards zero / car-free in the areas of highest accessibility.'	Car parking standards were reviewed and subject to further consultation as part of interim changes to the plan.
'personal injury accident records, including cyclist safety'; suggestion that this should also include perceptions of safety;	Car parking standards were reviewed and subject to further consultation as part of interim changes to the plan.
'Description and functional classification of the road network': suggestion that this could be dealt with by incorporation of street types for London into the evidence base.	Car parking standards were reviewed and subject to further consultation as part of interim changes to the plan.
It is recommended that Point 1.3 be amended to reflect this nuance as follows (proposed amendments underlined): "Provides all car parking spaces within the development site and not result in any adverse impact upon the existing public highway. Where appropriate, and subject to high quality design and ensuring pedestrian, cyclist and vehicular safety, some on-street residential car parking will be acceptable for new developments."	This would be contrary to the council's Kerbside Strategy which aims to reduce kerbside parking
Accordance with the London Plan	
Respondent considers there are several potential conflicts with London plan car parking	The parking standards acknowledge that they are more stringent than the London Plan. This

standards.	will encourage active lifestyles, manage air quality, achieve higher levels of housing delivery alongside public transport improvements and reduce the borough's contribution to climate change.
Respondent has suggested that the cycle standards for B1 are revised to be more closely aligned with those in the London Plan or additional wording is added clarifying that particularly ambitious standards are targets and meeting these will depend on site constraints.	The policy will be applied flexibly and where it is demonstrated that site constraints make it impossible to provide the required level of cycle parking that will be taken into account.
Respondent considers that there appears to be no requirement for visitor cycle parking for residential development in high PTAL areas (one space per 40 units in the London Plan).	The cycle parking standards in the PSV require visitor spaces.
Policy flexibility:	
Buyers of high end apartments, who are important to the viability of large developments, will often require car parking. Respondent recommends that the Policy DM48 is more flexible and allows a small number of off street car parking spaces in areas with PTAL levels 5 and 6.	The council seeks car free development in areas with the highest public transport accessibility. The policy will be applied flexibly and where a lack of car parking would impact on the viability of a development this will be taken into consideration. This must be robustly justified.
With reference to Appendix 6, the respondent strongly object to the cycle parking standards proposed for new residential developments. These are over and above the already excessive levels set out in the adopted London Plan.	The cycle parking standards reflect a strategy for every resident in the borough to be able to own a bike. This will encourage active lifestyles, manage air quality, achieve higher levels of housing delivery alongside public transport improvements and reduce the borough's contribution to climate change.
Respondent suggests that the policies should be adjusted to accommodate areas where the PTAL will improve in the future (with infrastructure improvements), particularly in AAP areas.	The policy will be applied flexibly and where public transport infrastructure improvements have been secured this can be taken into account.
(a) The requirement (para 1.2) that "the impact on surrounding streets must also be taken into account" should be made more prominent;	Policy amended in the PSV to give greater prominence to Controlled Parking Zones to manage the impact on surrounding streets.
(b) There should be more flexibility for developments, even in high PTAL areas, to provide for on-site parking, especially where with good design, it can be provided underground.	The council's strategy is to reduce the reliance on the private vehicle, reduce vehicle trips and improve air pollution in the borough. Therefore greater general flexibility with regards to parking provision is not appropriate.
(c) Exceptions to paras 2 and 3 should be allowed for the suburban areas of the borough, and other areas where there is likely to be sufficient on-street parking availability within CPZs.	
Enhancing other transport modes	
Respondent considers there is a lack of proposals for bus priority, for which there are potential synergies for cycling, such as around London Bridge station.	Bus priority improvements are sought under the transport infrastructure policy.
Respondent suggests that the NSP focuses on seeking to reduce private cars, at the expense of other forms of motor traffic such as Private Hire Vehicles and freight, which form a never growing proportion of traffic. These forms of traffic are increasing and, without measures such as road space reallocation and filtered permeability, will simply fill up any space freed	Noted, further measures to manage these transport modes may be required in the future.

up from private cars.	
Respondent considers that the NSP does not address people with disabilities who cannot access public transport.	Parking standards for disabled people and the mobility impaired are required under a separate policy.
Representation suggests that there is a particular gap in the evidence base relating to freight traffic and suggests a transport evidence base is required for compliance with national policy.	It is considered that the transport policies in the NSP are consistent with national policy. The council will continue to collect transport evidence and address issues identified within and beyond planning policy and decisions.
Car sharing schemes:	
The requirement of spaces to be provided for car-sharing schemes and community cargo-bike spaces should be added for major developments.	Car-sharing schemes and cargo-bikes may form part of proposals to reduce the need for car parking and car and service vehicle trips. These will be assessed on a case by case basis. There is not currently the evidence to include these in generic car parking standards.
The requirement for Car Free development in highly accessible areas (PTAL 5 or 6) is too onerous. Respondent suggests that the Policy should be revised to reference no residents parking permits within highly accessible areas and that the Council will encourage low car or car free schemes on these sites.	The council's strategy is to reduce the reliance on the private vehicle, reduce vehicle trips and improve air pollution in the borough. Therefore greater general flexibility with regards to parking provision is not appropriate.
The respondent recommends that there should be some clearer guidance in the NSP as to whether individual or communal garages are acceptable in planning applications in particular zones of the borough.	Garages will be considered under car parking standards when planning applications are assessed.
Respondent suggests that the plan or one of its appendices sets out standards for car club bays for all types of development in areas with a PTAL rating of 4 or less, based on the Use Class and m2.	Noted. However, car club spaces are assessed on a case by case basis, and take into consideration the proximity of other car club bays, the usage and the number of units proposed in the new development.
Respondent would recommend that the policy be amended to provide free membership to car clubs if requested by the resident.	The policy requires that free membership to a car club will be provided to residents of all new developments.
DM48.1.6d – There is a reference to “free membership per dwelling”. Clarification requested regarding where such dwellings are located – e.g. within the development or within a specified area around the development.	The policy will be applied to the development in question when assessing the planning application and the expected number of adult occupiers.

Amended policy DM48: Car Parking

Comment Summary	Council Response Summary
<p>General comments:</p> <ul style="list-style-type: none"> - Recommendation to use the term “efficient” rather than “rapid turnover” in sub-section 1.5 as this would be more appropriate to emphasize the aim of the policy to ease congestion as the former would imply that more traffic activity would be generated. 	- Noted.

<ul style="list-style-type: none"> - One respondent considers that the lack of clear guidance on the quantum of Town Centre parking could lead to ambiguity; 'appropriately sized' off street parking is open to interpretation. As such the NSP should either defer to the London Plan or provide its own standards. Another respondent has recommended amending part d of the policy to be more explicit in setting out how the 'required amount' is determined by and by whom. - Several respondents are supportive of the principle of the policy. One representation recommends that a pragmatic approach is taken to all developments to ensure that car free schemes can be achieved where possible (even outside PTAL 5 and 6 locations). - Respondent is supportive of the principle of car free development within high PTAL areas and considers that this is a practical and pragmatic approach to car parking within the highest PTAL zones and is supportive of this stance moving forwards. <p>Parking Standards:</p> <ul style="list-style-type: none"> - Respondent welcomes the aim to reduce car use but considers that the parking standards are considered too stringent in the less accessible locations. Residents living in low PTAL areas are likely to use cars and the policy should allow a greater degree of parking in these least accessible areas, the respondent considers that the requirements should be closer to those set out in the 2015 version of the policy. - Recommendation to adopt the same policy of maximum car parking standard of zero in new developments as per the Camden Local Plan. - Recommendation to take into account the future increases in PTAL within this area to ensure that there is no overprovision of car parking once the Bakerloo Line Extension is complete. <p>Cycle/alternative modes of transport :</p> <ul style="list-style-type: none"> - Respondent suggests including a policy that requires cycle parking with all new development and includes linking the development to the existing cycle network. - Recommendation to give priority to securing alternative means of travel such as enhanced cycle provision, car club memberships and Uber servicing arrangements. - Respondent strongly supports the policy, especially the requirement for 'car-free' residential development in high PTAL areas but considers that the policy could go further 	<ul style="list-style-type: none"> - The policy is worded to enable flexibility to ensure town centre parking provision does not become mechanistic and result in poorer outcomes. - Noted. - Noted - The parking standards reflect the Council's aspirations. - The parking standards reflect the Council's aspirations. - Future PTAL may be taken into account at the application stage. - The NSP policy does this. - The NSP prioritises public transport, car clubs, walking and cycling. - Noted
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<p>and require lower car parking provision in Opportunity Areas within the Borough including car-free/car-lite developments in accordance with the Mayor's Transport Strategy which seeks to lock in good growth in Opportunity Areas by restricting parking and improving public transport, walking and cycling.</p> <ul style="list-style-type: none"> - Recommendation to include a reference to the design of parking as an opportunity to ensure that the needs of pedestrians and cyclists are considered and vehicle dominance is reduced (in line with the Mayor's Healthy Streets approach). <p>Electric parking bays:</p> <ul style="list-style-type: none"> - Recommendation to recognize and emphasize that Major New Town Centres do require parking to serve the retail/ town centre uses and to ensure that the centre is viable and able to compete with centres of similar scale. The respondent considers that it would not be commercially viable to deliver a Town Centre scheme without any parking and this should be taken into consideration when determining planning applications. - The respondent considers that, reference should be made in the policy that further guidance on how this standard will be implemented will be set out in the OKR AAP. The respondent considers that a balanced approach has to be taken to promote sustainable forms of transport but also giving people the choice/opportunity to benefit from car ownership (where appropriate). - Respondent recommends using the term "car-free" rather than "zero maximum" standard as this implies that negative car parking is possible. - Respondent is unclear as to the requirement of electric parking bays but suggests that if this refers to active provision, that this is an unreasonable requirement and recommends this be amended to propose 20% for electric parking and 20% active provision. - Several respondents are concerned that point 6 of the policy is not consistent with the objectives of the London Plan and is too onerous. The respondent therefore recommends that the policy is amended to clarify whether all proposed car parking spaces, including those within public and private car parks, should be equipped with electric charging points. Several respondents have recommended that the proportion of spaces required for electric vehicles is consistent with the London Plan standards as at present electric car ownership is minimal and to provide each space with an electrical charging point would be an onerous requirement. 	<ul style="list-style-type: none"> - Noted. - Noted. This would be taken into account on a case-by-case basis where justified with evidence at the application stage. - The parking standards reflect the Council's aspirations. - Noted. The policy does not imply negative parking is possible. -- The parking standards reflect the Council's aspirations. - The parking standards reflect the Council's aspirations. The Council is working with the GLA to ensure NSP policy is in conformity with the London Plan.
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<p>- Recommendation to include a statement on the approach to charging for Town Centre car parking, the respondent strongly supports the policy but suggests including a reference to the 20% requirement of the London Plan provision to be 'active' with the remaining provision being 'passive'. Another respondent considers that the policy needs to provide some clarification as to whether the facilities can include active and passive provision (as per London Plan Policy 6.13) and whether development can install passive provision which has the capability of converting to active provision to allow for future adaptability.</p> <p>Car Club spaces:</p> <p>- Respondent comments that Car Club spaces within public car parks which are provided on-plot may not be accessible at all times and this should be clarified within the policy wording. Further to this, the respondent is unclear why a minimum of three years is required and how this has been derived.</p> <p>- Respondent comments that the policy raises questions as to whether a developer could offer different terms or other initiatives to encourage non-car modes instead of providing parking bays.</p> <p>- Respondent comments that whilst Car Club provision can play a role in reducing private car ownership, the location and promotion of these should be carefully managed to prevent those who would not otherwise use a car to start driving. The respondent states that the draft Mayor's Transport Strategy has a strong focus on prioritising public transport and active travel over other modes and as such these services are not appropriate within the CAZ and the contributions towards the cost of Car Club membership could potentially be used for purposes that are better aligned with the Mayor's goals such as cycle parking provision.</p> <p>- Respondent considers that sub-section 1.3 which refers to car clubs provision could be expensive and could lead to other objectives, such as the delivery of affordable housing. Respondent considers that car club incentives typically forms part of the car club operator's own financial model and any Car Club provision should be economically viable on its own merits and not funded by developers</p> <p>Non-residential parking standards:</p> <p>- Respondent considers that the policy is inflexible and doesn't allow for assessment on a site-by-site basis and recommends amending the policy to acknowledge there are circumstances where dedicated parking for larger format foodstores (for e.g. in a</p>	<p>- Noted.</p> <p>- This will be addressed in the background papers supporting the final submission of the NSP.</p> <p>- The Council would consider all initiatives to encourage non-car modes of transport through the development management process.</p> <p>- Noted.</p> <p>- - The policy reflects the Council's aspirations.</p> <p>- The Council would consider innovative approaches to providing parking on a case-by-case basis where strong justification is provided that demonstrates a particular need for parking spaces.</p>
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<p>basement or podium car park) can be an efficient way to provide parking as it avoids the loss of land which could provide alternative necessary uses such as open space, housing and affordable housing.</p> <ul style="list-style-type: none"> - Respondent objects to the revised policy that places restrictions on businesses without any reference to the need for appropriate and accessible parking spaces for delivery vehicles. <p>Residential Parking Standards:</p> <ul style="list-style-type: none"> - Respondent comments that the parking standards for residential uses do not differentiate between the sizes of the unit (i.e. those for families). <p>Disabled parking Standards:</p> <ul style="list-style-type: none"> - Respondent considers that a zero provision in high PTAL areas does not allow for the needs of blue badge holders and other essential car users or those that may need car for work (e.g. doctors/nurses on call, local authority, police, shift workers security staff etc.) or the needs of families who already own and need a car and considers that none of the supporting evidence demonstrates 'severe' harm as set out through the NPPF, caused through the provision of car parking at an appropriate level. - Respondent supports TFL's Healthy Street Agenda and welcomes the general approach set out in policy DM48. However, the respondent comments that the maximum residential car parking standards does not differentiate disabled 'blue badge' car parking spaces and therefore parity is sought as to whether this maximum standard include disabled parking provisions. <p>Policy flexibility:</p> <ul style="list-style-type: none"> - Recommendation to amend the policy to provide with some flexibility as there may be locations within the borough where there is low on-street parking stress levels and where on street parking can be shown not to result in any harm – flexibility should be allowed for parking stress to be evaluated. - The respondent is supportive of the effort to encourage sustainable modes of travel but considers that there should be some flexibility with regards to the delivery of parking spaces. - Respondent recommends that the council acknowledge that there is often market demand for car parking within new development, especially in relation to larger, family 	<ul style="list-style-type: none"> - The Council would consider parking proposals on a case-by-case basis where strong justification is provided that demonstrates a particular need for parking spaces. - Noted. -- The policy reflects the Council's aspirations. - Noted -- The policy reflects the Council's aspirations. -- The policy reflects the Council's aspirations. -- The policy reflects the Council's aspirations.
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units, which is reflected in the London Plan standards for car parking and recommends the policy be amended to refer to a minimal level of car parking rather than zero provision.	
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DM49 Parking standards for disabled people and the mobility impaired

Comment Summary	Council Response Summary
Please clarify what is meant by the introductory wording. What is an accessible car parking space and what is a wheelchair accessible unit?	The requirements for wheelchair accessible homes are set out under the homes for households with specialist needs policy. The parking space must be accessible to wheelchair users.
DM49.2.1 – Delete “to the nearest entrance” and replace with “to an entrance” so that it reads “Located within the development in close proximity to an entrance”	Suggested wording noted but the existing wording is sufficiently clear.
DM49.3 – Add “or any other use” so that the end reads “must not be returned to the general car parking pool or any other use.”	This suggestion would limit what the parking space can be used for i.e additional cycle storage, cycle maintenance etc.
this requirement can conflict with ‘car free’ policies i.e. where a developer proposes and/or is required to provide a car free development, there may not be space on site suitable for all or some of the required disabled car parking.	This is assessed on a case by case basis. The developer will be expected to provide justifications should they not meet the provisions required.
It is suggested that part 3 of Policy DM49 be amended as follows (proposed amendments underlined): “Ensures all spaces identified for people with disabilities or mobility impairments remain designated as such for the life of the development, unless it can be demonstrated to the satisfaction of the Council that there is a lack of demand for these spaces. Any spaces that remain unused must not be returned to the general car parking pool, unless otherwise agreed with the Council via a management plan.”	Unused spaces would be better converted to other uses such as additional cycle storage, cycle maintenance etc.
Respondent recommends that the policy should be adjusted to accommodate areas where the PTAL will improve in the future (with infrastructure improvements), particularly in AAP areas.	The policy will be applied flexibly and improvements to public transport taken into account where these have been secured.

DM50: Protection of amenity

Comment Summary	Council Response Summary
<p>Recommendation to expand the existing policy to put the onus on developers to show they have given full and proper consideration to the impact on the amenity of occupiers and users nearby.</p>	<p>No change is considered necessary. The information requirements for demonstrating policy compliance are set out separately in the validation checklists for different types of planning application and these include requirements for a range of studies relating to amenity (where appropriate) e.g. sunlight/daylight assessment, noise impact assessment, construction management plan.</p>
<p>Respondent asks how will 'amenity' and 'unacceptable loss of amenity' be defined?</p>	<p>An 'unacceptable loss of amenity' will be judged on a case by case basis taking into account the specific characteristics of the site, the objective assessments of impacts on noise, smells, sunlight/daylight, etc and the wider merits of the scheme.</p>
<p>Respondent has commented that the policy is negatively worded and should be amended to support "improvement and innovation" in amenity, so that designers can show how development can maintain and improve amenity.</p>	<p>The suggestion is noted but the policy as worded would not preclude innovation and the requirements sought by other policies in the plan would secure amenity improvements.</p>
<p>Respondent(s) are pleased with the revised wording of the policy, which protects the amenity of present or future occupiers whilst allowing new developments that do not create any appreciable/material impacts in terms of amenity to occupiers.</p>	<p>Support noted.</p>
<p>This policy should recognise that standards of residential amenity will differ across the borough. Residents of areas in close proximity to commercial, retail, leisure, industrial and community uses should expect a certain level of disturbance associated with the reasonable operation of these uses, in particular where these uses existed prior to the construction of new residential dwellings. Suggest amending the policy to reference the need to give significant weight to the objectives set out in Southwark's Strategic Policies.</p>	<p>When assessing any planning application the context of the site will be taken into account when considering its impacts and benefits. Each policy must be considered in the context of the whole development plan, it is not considered necessary to state this within this policy as the same applies to all the policies.</p>
<p>Respondent considers that there is no explicit acceptance of the need to assess the impact of new developments on the daylight amenity of cultural production spaces which depend on it. Artist's studios are universally acknowledged as being dependent on good levels of daylight for their function and this needs to be explicitly protected. Where long-term or permanent provision of artists' studios, or other daylight-dependent cultural production spaces, are affected by neighbouring developments, the existing levels of daylight should be protected in a similar way to those for residential neighbours.</p>	<p>The Council requires impacts on daylight and sunlight to existing residential properties to be assessed against guidance set out in BRE's Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice. The council should consider whether or not impacts on cultural spaces meeting specific criteria should also be required to be assessed as part of this process.</p>

DM51 Designing out crime

Comment Summary	Council Response Summary
Suggestion to encourage and, where appropriate, implement redesigns of both private and social housing estates where crime has become a problem through poor layout including the installation of CCTV.	This policy would apply to all development including housing refurbishment schemes. The design and funding of housing estate refurbishment/re design schemes is a regeneration issue rather than a planning policy issue per se.
Welcomes the policy DM51 Designing out crime	Support noted.
Respondent suggests a change to wording of point 2 on streets and paths to add: “ <u>while discouraging speeding and inconsiderate driving</u> ”. Anti-social driving such as speeding has topped Home Office surveys of anti-social behaviour. Although driving offences should be addressed by designing out crime, they rarely are in practice.	Every road that Southwark controls has a speed limit of 20mph, this will need to be taken into account when assessing planning applications under transport policies.

DM52 Open space and open water space

Comment Summary	Council Response Summary
General amendment suggestions:	
Representation considers that the policy makes no reference to residential density and open space deficiency, and addressing the issue of the need for more open space as more people come to live in Southwark, particularly in the north.	The NSP requires the provision of new open space, in the PSV this requirement has been moved to a separate green infrastructure policy. In addition site allocations secure strategic new open spaces in the north of the borough.
There is a big difference between open space and green open space. The latter should not be replaced by hard landscaping unless it improves quality and sustainability of space, and has no detrimental impact on flooding, air quality and health.	Policy requires ancillary development to enhance the quality of open space. Biodiversity, flood risk and air quality policies will also protect greenery and manage impacts.
Point 3 says “New open space... must be provided in major developments.” The respondent questions how will major be defined?	Major developments are defined nationally as schemes of more than ten residential units and/or 1000sqm of commercial space. The definition has been added to the NSP glossary.
“The Council should consider setting a target for increasing green cover and biodiversity in the Borough over the lifetime of the Southwark Plan. The London Plan has set a target at increasing green cover by 5% by 2030.	London Plan strategic targets for green cover apply in the borough. Open space, trees and green infrastructure policies will protect and require new green cover from development.
Respondent suggests that the New Southwark plan could incorporate different designations of green space that recognise the cumulative value of smaller green spaces within dense urban neighbourhoods.	Policy has been amended in the PSV to reflect the hierarchy of open space designations and a fact box has been added
Respondent regrets that Policy DM 60 Green Infrastructure and Urban Greening and 61 Community Food Growing from the previous New Southwark Plan Options Paper have not been incorporated in full in the NSP draft and strongly urge the Council to re-consider.	A separate green infrastructure policy has been added to the PSV which will support opportunities for food growing alongside healthy development and residential design quality policies.
Respondent considers that proposals in the Southwark Open Space Strategy to address the deficiency of open space in Bankside largely relate to small scale opportunities and publicly owned land. One of the best opportunities for creating the new open space envisaged by these policies is the closure or calming of underutilized roads. However the Southwark	Noted. The Southwark Streetscape Design Manual sets out the requirements of the local highway authority and is not part of the development plan.

Streetscape Design Guidance makes it very difficult if not impossible to green these closed or calmed streets.	
Open space designations:	
Many council estates have open spaces, including green spaces, which relieve the density of the area and provide the benefits given in the 'Reasons' for this policy, but these council estate open spaces are not listed here. Council estate open space is often the most immediately available space for informal recreation and their loss would be keenly felt by estate residents. The policy should be amended to state that planning permission will not be granted for developments on council estate open and green spaces.	The council's strategy is to directly protect public open space by designating specific areas, while ensuring residents have sufficient amenity space that is ancillary to the use of residential buildings. Private amenity space is secured by residential design standards and green infrastructure policy. Blanket protection of private amenity space would prevent the redevelopment of existing homes where these are of poor quality.
Respondents consider Nunhead Reservoir should be designated as open space/green space, encouraging Thames Water to allow access and providing an effective extension for walking and recreation to Nunhead Cemetery. Any concerns about security could perhaps be overcome by the installation of CCTV. There are over 6000 signatures on the online petition which shows the level of local support for this proposal.	Nunhead reservoir is already designated as Metropolitan Open Land (MOL), it is up to Thames Water to determine whether they can facilitate public access while protecting the water supply infrastructure.
Respondent objects to the deletion on the adopted policies map of all of the Borough Open Land/MOL site at the Canal Head end of Burgess Park's Green Chain Walk link to Peckham. This is a crucial open space setting for the Library and Leisure Centre. It is used for many public events including a farmers market. It is an essential gap in the built environment to enable the wildlife corridor linking Burgess Park with Peckham Rye Park. Building on it would block a green chain route that has been in development for decades; concentrate transport pollution; and cause conflict between pedestrians and cyclists if the entrance is narrowed further.	The plan does not propose the deletion of open space designations for Burgess Park or the Surrey Canal. Peckham Library Square is not currently designated open space and is subject to a planning permission for its improvement. The space could be considered for designation after the permission has been fully implemented.
Strongly supports the proposals for new open spaces in Appendix 4, including: <ul style="list-style-type: none"> • NSP NOS18 Nursery Row Park • NSP NOS3 Rodney Road / Victory Park • NSP NOS19 Salisbury Row Park Respondent suggests the boundary of Salisbury Row Park Extension should include the land behind Darwin Maisonettes and bordered by Mason Street on the opposite side and Gavel Street to the North as this land is already planted as an apple orchard and a community vegetable garden. Also the land on the opposite side of Catesby Street should be included as it is the play area and the newly created Peace Garden.	- Support noted - The suggested extensions are on housing amenity land. The council's strategy is to directly protect public open space by designating specific areas, while ensuring residents have sufficient amenity space that is ancillary to the use of residential buildings.
Canal Walks should have its designation as a Green Chain Walk for wildlife restored.	The Surrey Canal walk is not designated a green chain walk on the adopted policies map so this has not been removed. The walk is designated as Metropolitan Open Land.
The boundary of Nursery Row Park as shown in Appendix 4 and Appendix 5 is incorrect: the Brandon St frontage does not match the current OOS designation. Details of this are shown	The boundary of the designation has been amended in the PSV.

overleaf.	
The MOL at junction of Southampton Way/New Church Rd, car-park along New Church Rd, the indent on St Georges Road, the section left out on Glengall Road should all be included in the SINC.	Borough SINCs were reviewed by a team of ecologists and amendments to boundaries determined by their significance for the conservation of wildlife.
Respondent objects to the industrial designation for Park House Street being changed. The New Church Road wildlife site (part of a SINC) should not have residential properties built alongside it, as it would ruin its wildlife amenities, as the wildlife would flee the human interactions.	The site allocation does not amend the SINC boundary and its conservation value will be protected when planning applications on Burgess Business Park are assessed.
All the current Metropolitan Open Spaces with the Dulwich area should be retained.	The policies map retains all MOL in Dulwich.
Recommendation that the Grove Tavern site and the former BT Exchange site on Lordship Lane should be identified as opportunity sites.	Grove Tavern has been proposed as a site Allocation. BT Exchange on Lordship Lane was considered as a site allocation in the interim NSP consultation, but there is little likelihood of the site being available for development and the allocation has been removed.
Respondent proposes that in order to be in line with previous policy as regards the status of SINCs that Nursery Row Park and Salisbury Row Park should now be upgraded from Other Open Space to Borough Open Land. (Wording)	The proposed designations have been amended in the NSP to Borough Open Land.
Respondent notes the absence the green space on the Newington Estate which is both a vital through route for people walking to the Elephant & Castle from the estates and residential areas in the northern part of West Walworth as well as an important amenity for Newington Estate residents and we would propose its inclusion as Other Open Space.	The council's strategy is to directly protect public open space by designating specific areas, while ensuring residents have sufficient amenity space that is ancillary to the use of residential buildings. Private amenity space is secured by residential design standards and green infrastructure policy. Blanket protection of private amenity space would prevent the redevelopment of existing homes where these are of poor quality.
In Appendix 8, APZ 17 "Horsleydown" seems to exclude Portland Wharf, yet it is within the Southwark boundary shown in the map of APZ 17. Similarly, although within Southwark, Portland Wharf is not included in the list of Open Spaces in Appendix 4. Therefore the respondent suggests that this section of land must be included within the provisions of the New Southwark Plan. This has implications, for example, in relation to DM18 and DM52.	The council has reviewed the space and considered that an open space designation would not be necessary. The area is a very small area of open space, some 140 sqm, that already receives protection by virtue of being adjacent to the river wall and in a conservation area where it is referenced in the conservation area appraisal.

<p>Land to the south and east of the artificial pitch at Green Dale is part of the MOL, while it is not part of the SINC supposedly due to area having limited biodiversity value. Respondent accept that this is true of the artificial pitch; however not for the land to the south and east of the pitch, which is included in the MOL but not SINC. Do not seek SINC designation for the pitch but only for the land to the south and the east due to studies and reports referenced in the representation which demonstrate that the areas:</p> <ul style="list-style-type: none"> o Host hedgehogs and is part of the wider hedgehog habitat network o Hosts 7 tree species other than sycamores inc. hornbeam, Lombardy poplar, lime, whitebeam, black poplar, tree of heaven and ash which support a valuable diversity of insects and invertebrates. o Hosts diverse grass species due to infrequent/irregular mowing of grass o Provides a habitat linkage 	<p>Borough SINC's were reviewed by a team of ecologists and amendments to boundaries determined by their significance for the conservation of wildlife.</p> <p>This area benefits from protection by designation as MOL and biodiversity is protected by the biodiversity policy.</p>
<p>The MOL designation which covers the nursery at 65 Greendale should be amended to exclude the nursery buildings due to not conforming to the definition of MOL (i.e. being clearly distinguishable from the built up area, does not include open air facilities serving the whole or a significant part of London, does not contain any landscape features of national or metropolitan value and is not a link in the Green Chain network or form part of London's G.I)). The openness of the site has been reduced by the development next door which adjoins the nursery boundary. The site should be de-designated as SINC as the site does not have biodiversity or natural heritage value. The adjacent wildlife gardens should continue to be MOL and SINC, however. De-designation would enable development and economic growth and therefore be in conformity with NPPF para 20.</p>	<p>The planning history of the nursery at 65 Greendale indicates that the building was constructed as a sports facility ancillary to the MOL. The nursery has been accommodated through change of use as a valued community facility in exceptional circumstances, while not significantly affecting the openness of the MOL. The MOL designation will be retained to protect the openness of the overall MOL area at Green Dale.</p>
<p>Council estate open and green spaces must be given policy recognition due to being the most immediate and accessible spaces for many people and which provide the types of benefits described in the "reasons" text for this policy.</p>	<p>The council's strategy is to directly protect public open space by designating specific areas, while ensuring residents have sufficient amenity space that is ancillary to the use of residential buildings. Private amenity space is secured by residential design standards and green infrastructure policy. Blanket protection of private amenity space would prevent the redevelopment of existing homes where these are of poor quality.</p>
<p>Support for Open space:</p>	
<p>Respondent notes and strongly supports a number of designations in relation to Open Spaces in the NSP (Appendix 4). These include Lorrimore Square Gardens and Rodney Road / Victory Park as Borough Open Land as well as Nursery Row Park and Salisbury Row Park along with the Fielding St and Aylesbury Road allotments as Other Open Space.</p>	<p>Noted.</p>
<p>Respondent Welcomes the protection of open space, biodiversity and trees DM52, DM53, DM54.</p>	<p>Noted.</p>
<p>Respondent welcomes the delivery of new open spaces to serve new development, however,</p>	<p>The requirement for new open space has been moved to the green infrastructure policy in</p>

comments that these requirements should not impede the deliverability of development and render proposals unviable and therefore suggests that viability should be considered within the wording of the policy.	the PSV. That policy is flexible as to the quantity of open space required to take into account deliverability broadly. Open space can assist viability through increasing values of overlooking development as well as presenting a cost. If it is not possible for a development to provide open space due to viability then that will be taken into account when the planning application is assessed.
Respondent would like offer support of your preferred strategy in relation to the protection of 'Other Open Spaces'. As a Trust that currently runs a primary school in the area, we welcome the idea of ring-fencing external space for schools and educational establishments within the Borough.	Noted.

DM53 Biodiversity

Comment Summary	Council Response Summary
Welcome extension of SINC. Council should commit to improving inaccessible confusing and unsafe walking routes at One Tree Hill. Local Nature Reserves should be designated in planning policy.	The council consulted on improvement works to One Tree Hill in August 2016. The policy provides protection for Local Nature Reserves. These will also be shown on the planning policies map.
Welcome designation of following SINC in Walworth, SE17: NSP S5, S3 and S17 (Nursery Row, Salisbury Row and Faraday Gardens and St Peters Churchyard, respectively) as Local SINC. These spaces should be upgraded in open space protection terms from "other" to "Borough" as happened in 1995 with open spaces designated as SINC.	These spaces are proposed as Borough Open Land in the PSV.
Amend the incorrect boundary Appendix 4 and 5 for Nursery Row Park to match the existing OOS designation.	The proposed open space designation has been amended in the PSV.
Ensure policy incorporates and promotes the development of green corridors in all areas of the borough, in particular East Walworth where East Walworth Green Links have identified such corridors.	The green infrastructure policy requires the provision of new green links by development.
Recommendation to require additional protection beyond SINC to ensure council cannot make decisions regarding SINC sites to the detriment of their biodiversity (as at Camberwell Old Cemetery).	Policy designations are designed to provide protection to different land uses or environmental features. The designation enables the council to make decisions in view of any designations and afford weight to different policy designations depending on the circumstances. The council considers SINC designations to fulfil this function and therefore the council does not propose to provide an additional layer of protection/policy designation.
Respondent welcomes the protection of open space, biodiversity and trees DM52, DM53 and DM54.	Noted.

DM54 Trees

Comment Summary	Council Response Summary
Amendment suggestions:	
This policy should re-iterate retention of street trees as per DM9 as London Plane trees form part of the character of the borough on both local and TLRN road and retention is more effective than replacement or relocation.	The policy provides broad protection for trees which would include street trees.
Recommendation to Include targets for canopy cover to enable monitoring	Southwark has 108,000 trees providing an extensive canopy cover which the policy protects as well as requiring new tree planting. As well as increasing the tree canopy the council's strategy is to ensure trees are of high value to people and wildlife and resilient to environmental change. A quantitative target for monitoring might detract from the emphasis on the quality of tree planting.
Request that the policy acknowledge that it is unlikely that any replacement tree would be comparable in stem girth to any mature specimen removed at the time of planting and that it should be recognised that it will at times be necessary to remove diseased, dying trees or those oversized for their location. The policy should allow for the planting of more appropriate trees in this instance, which would be an improvement.	The policy as worded is flexible as it states that where a replacement tree of comparable stem girth is not possible a financial contribution must be provided.
Support for the policy	
Interesting and positive policy	Noted.
Support trees policy	Noted.

DM55 Environmental standards

Comment Summary	Council Response Summary
Require BREEAM "excellent" in all developments	The draft NSP policy requires that all non-residential developments achieve BREEAM "excellent." BREEAM standards apply to non-residential new build and refurbishment only since the introduction (and subsequent withdrawal) of the Code for Sustainable Homes and related national regulatory changes introduced by the government in 2014/15 which limits the requirements local planning authorities can set in their local plans.
Require standards for "embodied energy"	The now withdrawn Code for Sustainable Homes (CfSH) previously provided local planning authorities with the opportunity of specifying targets (in the form of CfSH levels) to be met. The CfSH calculations took embodied carbon emissions of the materials of the development into account. The withdrawal of the Code via the Written Ministerial Statement published March 2015 set out that local planning authorities are no longer able to require that new dwellings meet specific Code levels and that the Code would be wound down. Local planning authorities are no longer permitted to impose standards on the performance of new homes above and beyond certain prescribed areas that do not include embodied carbon.

Ensure BREEAM Excellent requirement is subject to viability as meeting this is not always feasible	The policy will be applied flexibly. Where achieving environmental standards would impact the viability of development this will be taken into consideration. This must be robustly demonstrated.
Respondent requests that "high environmental standards" is clarified in the policy or text.	The policy has been amended in the PSV to only apply defined environmental standards.

DM56 Energy

Comment Summary	Council Response Summary
Respondent asks to Clarify what is meant by enacted in 2.4.	Policy amended in the PSV to clarify requirements for decentralised energy in a hierarchy.
Recommendation to Include a proactive policy on DE networks, particularly considering the emerging opportunities afforded by SELCHP.	The policy proactively supports development of DE networks, particularly when considered in combination with energy policies in the London Plan.
Respondent Suggests the inclusion of an additional clause: Planning permission will be granted for development that incorporates flexible demand and storage technologies that facilitate the local and national decarbonisation agenda."	The policy is supportive. Technologies may be incorporated to meet the energy hierarchy and carbon reduction targets of the policy.
Suggested additional wording relating to the contribution of transport to carbon emissions and zero carbon.	Emissions from transport will be reduced by other policies in the plans, requiring 'car free' development in areas with good accessibility to public transport and ensuring any parking in developments provides charging points for electric vehicles.
Respondent recommends amending policy requirement for non-residential elements of major developments to achieve 40% reduction in CO2 rather than 50% as prescribed in NSP PO policy.	Policy amended in the PSV.
Recommendation to add wording regarding viability to the policy	The policy will be applied flexibly. Where achieving energy standards would impact the viability of development this will be taken into consideration. This must be robustly demonstrated.

DM57 Reducing waste

Comment Summary	Council Response Summary
Respondent requests the inclusion of the following points to strengthen policy and reflect the general (supported) ambition to achieve the highest possible sustainable standards and the minimum impact on local highways: <ul style="list-style-type: none"> Includes space for food waste storage/composting from commercial developments which are able to be used by nearby residential or community facilities for greening/food growing 	<p>The ambition of the representation is noted, however the council has limited scope to prescribe the management arrangements between occupiers of buildings/sites through planning policies in a development plan document.</p> <p>A servicing and refuse management plan is required for all major developments (as part of the validation checklist for new planning applications). The council provides additional guidance online on sustainable waste management.</p>

<ul style="list-style-type: none"> • Enable adjacent buildings to a new development to use the recycling/storage/compacting facilities • Require that waste be consolidated on site to reduce the number waste vehicle trips 	
<p>Respondent suggests requiring businesses and other organisations to reduce the impact of their activities on air, land and water, using resources efficiently and minimising waste disposal and manage their waste responsibly</p> <p>Ensure the right waste and resource management infrastructure is in the right place.</p>	<p>The policies proposed in the NSP seek to achieve these aims through the planning and design of the development.</p>

DM58 Land for waste management

Comment Summary	Council Response Summary
<p>Ensure the right waste and resource management infrastructure is in the right place</p>	<p>It is considered that the policy and supporting text largely addresses this point.</p> <p>The policy wording has been expanded in the PSV and the integrated waste management facility designated on the policies map.</p>

DM59 Environmental Protection

Comment Summary	Council Response Summary
<p>Encourage developers to liaise with developers of neighbouring sites to co-ordinate a activity to minimise construction/development impacts. Construction management plans should be publically available. Include good best practice examples in the plan to support the policy.</p>	<p>Noted, policy can underline co-ordination with the requirements that all developers must meet but further encouragement must take place outside of planning policy and decisions. Construction Management Plans are publically available.</p>
<p>Policy should require that ground water of a development site be improved,</p>	<p>The reducing flood risk policy requires the use of SUDS to reduce surface water run-off. SUDS measures such as green roofs and swales help to clean runoff as well as slowing flows, contributing to improved water runoff quality and potentially also improved ground water quality where this infiltrates. Redevelopment that addresses contamination may also help to improve ground water quality.</p>
<p>Suggestion to locate future development where pollution and other adverse effects on the local environment or amenity are minimised.</p>	<p>NSP policies, including the environmental policies seek to ensure development are in locations where pollution and other adverse effects on the local environment or amenity are minimised.</p>
<p>Development management and strategic policies should be included to require that developing on contaminated land won't create unacceptable risks or allow existing ones to continue</p>	<p>The policy requires development to remediate contaminated land removing the risk.</p>

DM60 Improving air quality

Comment Summary	Council Response Summary
Suggested amendments:	
Major developments should be defined	Major development is defined nationally – 10 residential units or greater or 1,000sqm gross non-residential floorspace or greater
It should be made clear that DM60.2 (requiring improvements beyond those implemented for Air Quality Neutral standards required via DM60.1) is in addition to and not in place of DM60.2.	The wording of the policy makes clear that this is the case.
Air Quality Neutral (AQN) benchmarks should include benchmarks for PM2.5 (which can contribute to increased levels of lung cancer, more so than PM10) as well as PM10 and NOx as currently prescribed. A major source of PM2.5 is motorised vehicles. Therefore the AQN standards should include benchmarks for PM2.5 due to the impact that construction vehicles used for development can contribute to poor air quality.	The council has sought to include the Air Quality Neutral benchmarks introduced by the Mayor of London into local plan policy. The definition and justification for the air quality neutral benchmarks are set out in the background paper (see http://www.aqconsultants.co.uk/getattachment/Resources/Download-Reports/GLA-AQ-Neutral-Policy-Final-Report-April-2014.pdf.aspx). Section 2 (para 2.2 on page 4) sets out the reasons why PM2.5 was not included as a benchmark. The council considers this to be justified.
Respondent recommends requiring developers to set out how the design of the development will minimise the potential for the occupiers of the development, through their behaviour, to contribute to worsening air quality.	Policy has been amended in the PSV to include further detail of design solutions. Requirements for 'car free' development and electric vehicle charging points in other NSP policies will minimise the potential for occupiers own and make heavy use of motor vehicles. Requirements to meet air quality neutral standards will mean that the air quality impacts of occupants' behaviour with regard to heating and using power in buildings will be mitigated.
Suggested <i>additional wording</i> to include: "Reduces the exposure and mitigates through design solutions that may include orientation and layout of buildings and ventilation systems, facilities to encourage use of electric vehicles, fail-safe cycle storage facilities, and planting of trees."	Policy has been amended in the PSV to list urban greening among the design solutions. Other NSP policies cover a range of issues that impact on air quality, such as cycle parking provision, requirements for 'car free' development, requirements for electric vehicle charging points.
Policies should reference the current poor levels of air pollution in the borough.	The policy reasons have been amended in the PSV to refer to current poor air quality in the borough.
Respondent suggests including the requirement or reference "fresh air squares," monitoring, the importance of improved air quality in relation to schools.	The council will consider the delivery of "fresh air squares" as part of a development proposal as one of the measures which could form part of the requirements "to go above and beyond Air Quality Neutral Standards" within the Air Quality Focus Areas. Achieving air quality neutral standards will mitigate the impact to schools. The education places policy has been amended in the PSV to emphasise the importance of air quality in relation to schools.
Recommendation to set targets for air quality	The council has targets for air quality expressed in its Air Quality Improvement Strategy and Action Plan (2012 – 2017) and is looking to publish an updated strategy. The action plan will include targets for air quality across the borough as a whole and for the planning

	service to meet.
The supporting text to the policy makes reference to motorised road vehicles as the main pollution source of concentration of poor air quality. However the respondent considers that the policy does not specifically reference motorised vehicles/car parking (i.e that a lower level of car parkings should be provided in air quality focus areas/higher level of spaces for electric vehicles than elsewhere).	The council has proposed a strict car parking policy proposed in the NSP. In addition to this, the proposed air quality policy includes the requirement for all development in the Air Quality Management Areas to meet or exceed "Air Quality Neutral" (AQN) benchmarks. The AQN benchmarks are taken explicitly with regard to air quality impacts of the development from both building operation and anticipated trip generation of motor vehicles. Therefore consideration and mitigation of motorised traffic's contribution to poor air quality is addressed by the plan.
Support for policy:	
Interesting and positive policy	Noted
Respondent welcomes the policy	Noted
Air Quality Management and Focus Areas	
Blackfriars Road should be included within the Air Quality Management and Focus Areas	Blackfriars Road is already included in the Air Quality Management Area (AQMA). The justification for the boundaries for the Air Quality Focus Areas was those broad areas identified by Transport for London in which had both the exceeded EU annual mean limit value for NO2 and locations with high human exposure. Using this definition the GLA did not identify Blackfriars Road as being an Air Quality Focus Area, therefore the council would have limited justification in designating this.
Representation has suggested extending the air quality focus area to include London Bridge.	The justification for the boundaries for the Air Quality Focus Areas was those broad areas identified by Transport for London in which had both the exceeded EU annual mean limit value for NO2 and locations with high human exposure. Using this definition the GLA did not identify Blackfriars Road as being an Air Quality Focus Area, therefore the council would have limited justification in designating this.

DM61 Reducing noise pollution

Comment Summary	Council Response Summary
General amendment suggestions:	
Recommendation to add in the requirement for this policy to be addressed through the submission of construction management plans.	Construction management plans (CMPs) are a requirement for all development of over 500sqm and or 25,000sqm of non-residential floor space in order to be considered a valid application. CMPs will be secured by condition for smaller applications as appropriate. Southwark's guidance for CMPs includes reference to noise and vibration as key issues to address. To streamline the document we have not generally referred to specific information requirements under the policies.
Respondent has recommended to re-word DM61.3 to include: "present occupiers of the site, adjoining neighbours and any other users near to the development site who may experience noise pollution during the construction process."	The policy refers to the present and adjoining occupiers for a site. Should the developer/contractor comply with this requirement it is implied that the noise levels will be reduced for the "any other users" referred to in the representation. Therefore the council

	considers the wording to be adequate.
DM61.4 – Respondent suggests that the text is reworded to read “Mitigates and manages noise primarily through the use of separation from major noise sources, distance and screening or internal layout, as well as sound insulation where appropriate, for noise sensitive developments.” Reason: Clarification of wording.	The council considers that this suggested rewording does not add clarification on the policy clause which seeks to clarify that the former is preferred over the latter.
Suggestion to add a new policy clause which reads: “DM61.5 - Sets out agreed hours of work, specific quiet times and arrangements for communicating with all nearby stakeholders, including a contact point for the development who is available at all times and who is obliged to respond within three hours of receiving a communication from a stakeholder.	It would be possible for the council to require such an agreement be made with an applicant through policy. However the applicant would transpose responsibility to the contractor and there is therefore less guarantee of this policy being enforced. The council considers the existing arrangement using the Environmental Protection Team’s Construction Management Plan process to be adequate. The validation checklist for planning applications requires all developments providing over 500 homes or more than 25,000 sqm of floorspace to demonstrate how negative impacts of the construction process on the amenity of neighbouring occupiers and the environment will be managed and mitigated by submitted a Construction Management Plan.
Suggestion to add a new policy clause which reads: DM61.6 - For any development including [1,000sqm or more of new or improved floorspace] applies for and is granted prior consent under S61 of the Control of Pollution Act 1974.”	The NSP will avoid confusion by not referring to other regulatory powers. If said prior consent is material to the consideration of noise issues that will be considered on a case by case basis when planning applications are assessed.
Recommendation to amend the policy to include policy requirements for delivery times which affect noise pollution, particularly at night. For example on-site, separated loading bays.	The ways in which developments will be serviced must be fully demonstrated in planning applications to enable an assessment of the impacts on noise as well as on wider issues such as pedestrian safety, place quality and traffic flow. Where necessary planning conditions can be applied to mitigate impacts. It is not considered necessary to add this specific point to the policy.
Other comments:	
Enforcement of noise from nightclubs must be better enforced.	Noted. The council is required to consider such issues when permitting such uses from a planning perspective and also from a licensing perspective. If there are thought to be any breaches of planning control/licensing restrictions this should be reported to the council to enable a formal investigation and where necessary have action taken.
Representation considers that housing is not appropriate in town centres with established/growing night time economies.	The council considers that housing is appropriate in town centres, however acknowledges that proximity to established night time/evening businesses and facilities must be carefully considered and mitigated in the housing development to ensure the vibrancy and diversity of our town centres is not reduced where non-residential is affected by complaints from new residents.
Respondent welcomes policy DM61	Noted
Respondent considers that the NSP has not designated quiet areas (see NPPF para 123) and should add a policy clause to this effect which reads: ‘5 Protect and enhance the natural soundscape of areas prized for their tranquillity, namely Peckham Rye, Dulwich Park, Southwark Park, Russia Dock, Burgess Park and Greendale.	The policy has been amended in the PSV to enhance positive aspects of the acoustic environment of designated open and water spaces, civic spaces and street markets.

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DM62 Reducing water use and improving water quality

Comment Summary	Council Response Summary
<p>The respondent lists the outcomes they would wish to see below:</p> <ul style="list-style-type: none"> • The quality of surface, ground and coastal waters continues to improve • Protection and enhancement of the environment and promotion of multifunctional benefits • Required infrastructure to support the delivery of Local Plan economic and housing targets • LPAs take a catchment scale approach to the water environment to develop their Local Plan policies • Reduction in Combined Sewer Overflows and misconnections <p>Water resources:</p> <ul style="list-style-type: none"> • Enough water for people and the environment, accounting for climate change • Safe, secure water supplies are used efficiently to meet needs • Water is recognised and protected as a precious resource • Water efficiency in new buildings is encouraged to reduce water use and cut carbon emissions 	<p>The quality of surface, ground and coastal waters and delivery of multifunctional open spaces incorporating SUDS will be improved by implementation of the reducing flood risk and related policies on SUDS in the London Plan.</p> <p>The council's infrastructure plan and policies on infrastructure and implementation will secure the infrastructure required to support growth.</p> <p>A catchment scale approach is being informed by our updated Strategic Flood Risk Assessment and by the Old Kent Road Integrated Water Management Strategy. Use of this evidence in combination with the policy will help to ensure efficient use of water resources and management of flood risk taking into account projected growth and climate change.</p>

DM63 Reducing flood risk

Comment Summary	Council Response Summary
<p>Respondent supports the approach to Sustainable Drainage as set out in the Planning Practice Guidance.</p>	<p>Noted.</p>
<p>Respondent notes that Policy DM63 of the New Southwark Plan does not refer to Southwark's Strategic Flood Risk Assessment in planning for development nor does it refer to Southwark Local Flood Risk Strategy when considering flood risk.</p> <p>Respondent recommends the policy is amended to include the following:</p>	<p>Noted, in the interests of making the document as concise and streamlined as possible we have generally not included references to evidence base documents and other strategies within the policies or reasons. Appendix 1 of the preferred option references the Local Flood Risk Management Strategy. Southwark works closely with neighbouring boroughs on a range of issues including ensuring a joined-up approach to riverside redevelopment..</p>

<p>Managing tidal flood risk in accordance with the measures set out in the TE2100 plan. Developments should take into account the ability to implement future improvements to flood defences, in accordance with the Environment Agency's TE2100 Plan.</p> <p>Ensuring the New Southwark Plan reflect the riverside strategy concept and promote an integrated approach to riverside development that takes full account of future flood risk requirements and opportunities to provide wider environmental enhancements</p> <p>Development and regeneration in Southwark is located and designed to be resilient to flood risk, climate change and reduce reliance on traditional flood defences. Location and design should be informed by the latest evidence on flood risk and climate change</p> <p>Development proposals, excepting some minor proposals will require Flood Risk Assessment (FRA), taking account of the Strategic Flood Risk Assessment, the Surface Water Management Plan and the Preliminary Flood Risk Assessment for the borough.</p> <p>Where development is permitted within flood risk areas it must demonstrate that where possible, it will reduce fluvial, tidal and surface water flood risk and manage residual risks through appropriate flood risk measures.</p>	<p>Policy has been amended in the PSV to require development to be set back 10m from the river defence wall to safeguard the ability to implement future improvements to flood defences.</p> <p>Amendments require that safeguarded riverside space should be designed and delivered for dual purposes by incorporating the required flood defence measures and providing an enhanced public amenity and environmental benefit.</p> <p>Flood risk assessments required by the policy will be required to take into account the latest evidence.</p> <p>Flood risk assessments required by the policy will need to take higher level assessments into account.</p> <p>Flood risk assessments required by the policy will identify appropriate measures and these will be secured by planning permissions.</p> <p>The council has recently updated its Strategic Flood Risk Assessment which will be an important evidence base for applicants and for assessing planning applications. Our validation checklist makes sets out the requirements for an FRA and includes a hyperlink to the council's flood risk management guidance and resources.</p>
<p>Green infrastructure:</p>	
<p>Hard, permeable surfacing may help with water run-off, but still exacerbates urban heat islands and loss of habitat and green visual amenity. Respondent comments that if this cannot be included under DM63, then perhaps under DM16.</p>	<p>The NSP will manage biodiversity and amenity impacts and require new green infrastructure under other policies in the NSP.</p>
<p>Respondent considers the second part of the policy should be revised to align with the requirements of Policy 5.13 of the London Plan that requires that developments should aim to achieve greenfield runoff rates and ensure that surface water is managed as close to its source as possible. Drainage strategies for all new developments should aim to typically have greenfield runoff rates of 5l/s/ha and should follow the drainage hierarchy set out in the London Plan.</p>	<p>The policy has been amended in the PSV to refer to a 'green field' rate of run-off in line with London Plan policy 5.73.</p>

Respondent comments that If this policy provides for further discouragement to impermeable hard-standings, it is to be welcomed.	Noted
New hardstanding for cars is recommended to be required to retain permeability to rainwater and sufficient soft landscaping retained to allow surface water to enter the soil rather than entering the public surface water drainage system in order to prevent surcharging of the existing drains and increasing the potential for flooding.	The policy requires hard surfacing of front gardens to use permeable surfacing to reduce rain water runoff. Soft landscaping is encouraged by green infrastructure and design policies.
Respondent strongly supports this policy of requiring hard surfacing to be permeable but have commented that the colours in the key are not the same as those on the map [figure 10].	Noted. The presentation of the map will be checked in the published version of the PSV.
Respondent Suggests adding '...through the application of green infrastructure' in the final sentence of DM63.2	This is not considered necessary as SUDS include green infrastructure which is also required by the green infrastructure policy.
The policy should include reference to protecting trees and seeking to maximise the number of additional trees planted as trees absorb significant amounts of surface water and so are essential to protecting the borough from run-off surface flooding.	Trees are protected under the trees policy.
Respondent states that the proposed approach in policy DM63 should seek a 'green field' rate of run-off in line with London Plan policy 5.73.	The policy has been amended in the PSV to refer to a 'green field' rate of run-off in line with London Plan policy 5.73.
Respondent welcomes Southwark's wider policies on environmental management and pollution control in the Cleaner, Green and Safer section.	Noted.
Basement:	
Respondent requests that all basement development incorporates a positive pumped device or other suitable flood prevention device to avoid the risk of sewage backflow causing sewer flooding. This is because the wastewater network may surcharge to ground level during storm conditions. Such measures are required in order to comply with paragraph 103 of the NPPF which highlights the need to avoid flooding and also in the interests of good building practice as recognised in Part H of the Building Regulations.	Alongside adoption of the NSP we are proposing to adopt some changes to our validation checklist for planning applications. An additional requirement that we have already proposed is for a Basement Impact Assessment that will be required for new or extended basements. The guidance states that this should address, amongst other things, impacts on surface flow and flooding and groundwater flow.
The current propensity for extensive basement construction ought to require a planning application report on the effect on groundwater.	Alongside adoption of the NSP we are proposing to adopt some changes to our validation checklist for planning applications. An additional requirement that we have already proposed is for a Basement Impact Assessment that will be required for new or extended basements. The guidance states that this should address, amongst other things, impacts on surface flow and flooding and groundwater flow.

DM64 Infrastructure

Comment Summary	Council Response Summary
Recommendation to amend the policy to make reference to the Council working with Thames Water 'or any other successor body' given that Thames Water may be replaced by another organisation in the period up to 2033.	The policy has been amended in the PSV to state simply that the council work with utility companies.
A policy is required in the Local Plan to ensure that any water and wastewater infrastructure required to support development is delivered prior to the occupation of development.	Policy amended in the PSV to clarify that water and waste water infrastructure must be in place at an early stage.
The respondent considers that the redevelopment of Canada Water and the resulting population influx will place considerable pressures on education and healthcare facilities and transport infrastructure and asks is there any plans for these facilities within the development?	Site allocations have been added to the plan, updating those in the Canada Water AAP, requiring new education places and a new health centre in Canada Water.

DM65 Southwark CIL and Planning Obligations

Comment Summary	Council Response Summary
Construction management plans:	
Respondent suggests that service and delivery plans, and construction management plans are referenced in this policy.	Construction environment management plans and transport assessments are required to be submitted with planning application in Southwark's validation checklists.
Recommendation to include reference to construction management plans in addition to travel plans. These plans are critical in order to manage freight impacts better.	Construction environment management plans and transport assessments are required to be submitted with planning application in Southwark's validation checklists.
Suggested amendments:	
Respondent suggests that simplicity and clarity is needed in relation to "development mitigation and support funds" otherwise the local planning system and service will lose credibility, support and purpose.	The policy has been amended for simplicity and clarity in the PSV. Southwark produces planning guidance where development contributions can be anticipated.
The Council received a number of representations calling for additional detail and guidance describing the purpose of CIL and clarifying how funds will be spent, including guidance outlining what spending will be prioritised.	The policy had been amended in the PSV to refer to the list of CIL funded infrastructure projects. Further direction regarding CIL and Section 106 planning obligations is provided and consolidated in the Council's Supplementary Planning Document. Those wanting additional guidance on development contributions in the form of CIL and planning obligations should consult this SPD. This is complemented by a Community Infrastructure Projects List (CIPL) which directly identifies some of the projects which will be funded by CIL and accounts for 25% of CIL expenditure.
It is understood that there may be a different funding model in the Old Kent Road Opportunity Area to elsewhere in the borough. For clarity, respondent suggests that this could be mentioned in DM65.	CIL and section 106 planning obligations will be required in the Old Kent Road opportunity area as in other parts of the borough.
Respondent considers that it would be helpful if the first bullet related to planning obligations could make reference to bus service enhancements as these rely on S106 funding, as opposed to CIL. More frequent filling and emptying of cycle hire docking stations	The policy has been amended to remove the infrastructure categories for simplicity and as they will be needed where necessary to meet other policy requirements in the plan.

in cases where additional docking points cannot be provided and pump priming of Riverbus Services are other examples where s106 funding remains appropriate.	
Existing heritage and infrastructure:	
Representation requests that reference to infrastructure should explicitly include cultural facilities, as distinct from leisure, recreation and community space. This will aid cultural production and provision.	The policy has been amended to remove the infrastructure categories for simplicity and as they will be needed where necessary to meet other policy requirements in the plan.
Southwark CILs should refer to the proportion of CIL which will be spent locally and the mechanism by which local communities decide the priorities for use of CIL funds.	Further direction regarding CIL and Section 106 planning obligations is provided and consolidated in the Council's Supplementary Planning Document. Those wanting additional guidance on development contributions in the form of CIL and planning obligations should consult this SPD. This is complemented by a Community Infrastructure Projects List (CIPL) which directly identifies some of the projects which will be funded by CIL and accounts for 25% of CIL expenditure.

DM66 Enforcement

Comment Summary	Council Response Summary
Recommendation to amend the policy to be more prescriptive in its definition of a amenity to avoid ambiguity.	The policy has been amended in the PSV to reflect the policies in the council's Enforcement Plan.
Respondent requests that the Council provide clearer direction in describing what action will be taken if this policy is breached.	Enforcement action can require the use of various formal powers as well as informal negotiation to resolve planning breaches. It would not add clarity to list all the enforcement tools at the council's disposal here. Further information on enforcement is available in the Enforcement Plan.

DM67 Compulsory Purchase Order

Comment Summary	Council Response Summary
Respondent is concerned that the policy does not provide sufficient guidance or clarity on the criteria or thresholds that will be used to evaluate the need to exercise a compulsory purchase approach to land acquisition for 'planning and regeneration objectives'.	Compulsory purchase powers are subject to strict and detailed legal requirements. It would be unnecessary and would not add clarity to the plan to set these out in the policy.

DM68 Monitoring

Comment Summary	Council Response Summary
A robust monitoring framework for the New Southwark Plan is suggested so that its impacts can be monitored over time. The current guidance provided at Appendix 7 does not provide sufficient guidance or coverage of policy monitoring.	The proposed monitoring framework has been reviewed in the PSV and it is considered robust.
Respondent suggests that the council consider including a commitment to monitor progress on the delivery of the agreed 'Area Visions' and the infrastructure funding raised and spent in each, including; council funds, grants 106 and CIL to enable local residents and businesses to see more clearly how progress is being made.	CIL charging authorities are required to publish a separate annual report on the borough CIL income and expenditure.

DM70: Self and Custom Build

Comment Summary	Council Response Summary
<p>General comments:</p> <ul style="list-style-type: none"> - Two respondents agree with the amended policy. - Representation opposed to the to the restrictions placed on self and custom build which undermine the potential of this policy to empower local communities and the barriers of providing evidence of financial resources and making efficient use of land and appropriate density should be deleted. <p>Suggested amendments:</p> <ul style="list-style-type: none"> - Respondent considers that the definition should be widened to include all community forms of housing and provide support to make community form of housing deliverable. - Requests to make the register fully accessible to community builders, neighbourhood forums and other community interests. 	<ul style="list-style-type: none"> - Noted - The policy is supportive of Self and Custom Build. All development should make efficient use of land and of an appropriate density. - Noted. However, the policy should be considered in the context of national legislation which supports Self- and Custom Build specifically. This includes group custom build. - The Council publishes the Self and Custom Build register on the Council website.

DM71: Small Shops

Comment Summary	Council Response Summary
<p>General comments:</p> <ul style="list-style-type: none"> - One respondent agrees with the revised policy as independent shops should be present. - Respondent is supportive of the policy and the delivery of new employment floorspace and support for the delivery of small business units where appropriate. - Respondent supports the council's policies DM26 and DM71 and their aim to protect small workspace and would find it appropriate to reach a balance between such protection for small space and the enhancement/efficient utilisation of railway land. Further, the respondent requests that a definition of a threshold to define small business units is provided. <p>Suggested amendments:</p> <ul style="list-style-type: none"> - Respondent considers that 'active frontages' should not be included on all sites to the detriment of other uses and could lead to an over supply and result in empty properties which are detrimental to the appearance of an area. 	<ul style="list-style-type: none"> - Noted. - Noted - Noted. The PSV amends the policy to provide additional clarity. - Noted. The Council will consider the appropriateness of active frontages on development proposals.

<ul style="list-style-type: none"> - The respondent considers that to ensure the desired outcome, the definition of 'affordable' and 'suitable' should include a required minimum level of fit out. - Recommendation to support the encouragement of useful shops and a restriction on the dominance of hot food takeaway or coffee shops to enable district centres to remain as liveable neighbourhoods. - Respondent welcomes the policy suggests these amendments: <ul style="list-style-type: none"> · <i>Delete the 80sqm maximum GIA for small shops so that retail units are provided that meet the needs of small and independent retailers</i> · <i>All Opportunity Areas should have a requirement to provide affordable rent (not only Elephant & Castle).</i> · <i>Include improvements and measures to help strengthen the retail offer of small and independent businesses</i> - Respondent is supportive of the policy approach but believes that the policy can be strengthened by providing a definition of "affordable" as well as "small". - Respondent considers that the policy should identify the opportunity for a diversity of ownerships of small units including the role of community development trusts as a means of securing small units in the long term. - Respondent considers that the policy can be strengthened to mitigate adverse impacts on the development by investing in measures to improve the environmental quality which support existing small shops and the attractiveness/competitiveness of centres; consistent with the approach supported by the Mayor's 2014 SPD guidance on Town Centres. - The respondent considers that the policy should have regard to the wider environment of a proposal in respect of what an appropriate balance of small units should be as it may not always be appropriate for a development to provide or retain small shops – particularly where a significant number (including vacant units) exist in the wider town centre. Respondent suggests that it should be clear where each sub section applies to sites within a designated town centre or not as 1 refers to town centres, 5 to the Elephant & Castle Opportunity area and other sub-sections make to reference to a designated area. 	<ul style="list-style-type: none"> - The policy does not define affordable as this will vary across the borough and depend on the specific operator's finances and spatial requirements. - Noted. However, the New Southwark Plan cannot determine which businesses operate from a consented land use. - Noted. Policy has been amended to reflect some of these recommendations. - As above. - Noted. - Noted. - Noted - The policy provides for a range of unit sizes to be provided. As such the policy does not undermine the opportunity to provide retail space suitable for a range of retailers.
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<ul style="list-style-type: none"> - Respondent considers that it would be more appropriate for the policy to be based on number of units rather than floorspace as the retail offer in Canada Water will need to attract a range of retailers and flexibility is therefore required to ensure that Canada Water can perform as a Major Town Centre. 	
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Bankside and the Borough Consultation summary

Bankside and the Borough Area Vision consultation response summary:	Council Response:
<ul style="list-style-type: none"> - Suggestions for general amendments of Site Allocation vision/text: <ul style="list-style-type: none"> - Recommendation to reassess the Area Visions map as the respondent does not feel it is clear enough. - A respondent has commented requesting that the map includes listed buildings - A respondent has commented requesting that the map includes proposed open space in Bankside Neighbourhood Plan pre-submission. - Additionally it was suggested that the maps should take a more ambitious approach to routes and open spaces to mitigate the effects of a population increase. - Many representations have requested that a greater emphasis is placed on green spaces. - The Vision should state that there is an emerging neighbourhood plan in this area as these should be recognized by the NSP. - Encourage a wider variety of uses by amending the site description to include references to other (existing) uses rather than the focus on the area being predominantly shopping-based retail. - The Area Vision should have a focus on heritage assets by developing the 	<ul style="list-style-type: none"> - The Area Visions maps have been revised for the PROPOSED SUBMISSION VERSION to enhance clarity. - The Council considers The Area Visions map would be too cluttered if it were to include Listed Buildings. However, the Site Allocations maps do include Listed Buildings for the PROPOSED SUBMISSION VERSION . - The NSP is the Council's Plan for the borough. Neighbourhood Plans may designate new open spaces. Proposed open spaces put forward through neighbourhood planning preparation do not form part of the Council's proposals of the NSP. - The maps in the Area Vision represent the Council's ambitions. - The maps include designated open spaces; some of which are green. - All development proposals must be made in accordance with the development plan unless there are material considerations which indicate otherwise. The NSP doesn't need to recognise individual Neighbourhood Plans as, once adopted, they form part of the Development Plan - The existing uses on Site Allocations have been ascertained following review. Where representations have identified any inaccuracies the PROPOSED SUBMISSION VERSION has been updated to reflect this.

<p>Bear Gardens.</p> <ul style="list-style-type: none"> - The name 'Bankside and the Borough' reads strangely - One respondent expressed concern that the area vision seems 'self contained' in that some important areas falling outside the boundary may be disregarded. - Text should be amended to reference the area's location within Flood Zone 3 and its susceptibility to tidal flooding from the River Thames. The River should be more explicitly referenced as it is a significant asset of the area. <p>-Respondent recommends that Borough Market should be identified in both Bankside and The Borough and London Bridge Area Visions to recognise the market's important contribution to the area for its food/culinary education/training skills.</p> <ul style="list-style-type: none"> - Respondent suggests the introducing safeguards which include design codes and controls over uses to protect conservation areas and areas at risk of being lost to redevelopment. <p>Tall buildings:</p> <ul style="list-style-type: none"> - Some respondents requested the Area Vision to implement a 10 storey height restriction on residential and office buildings outside the core business areas. <p>Transport/connectivity routes:</p> <ul style="list-style-type: none"> - Cycling and walking should be strongly supported but additional measures should also be taken to improve air quality. - The Vision should include reference to the provision of quality affordable housing. - One respondent has voiced concerns regarding the number of Site Allocations in the Area Vision and would like to see development occur in phases. Another has commented that more sites should be allocated for 	<ul style="list-style-type: none"> - The area vision notes that heritage assets are important to the character of the area. Therefore applications to enhance Bear Gardens would be consistent with the Area Vision. - Some residents refer to 'The Borough' and others simply to 'Borough'. - Area Visions do not have discrete boundaries. The relevance of the Area Vision to any specific development proposal would be judged on the merits to the proposal. - Planning policy relevant flooding policy is set out elsewhere in the plan. The Area Vision has been revised to elevate the significance of the River Thames. - The PROPOSED SUBMISSION VERSION references Borough Market in both Area Visions. - Applications should respect the character of the area. Applications in Conservation Areas and in the setting of conservation areas will be assessed against the borough-wide conservation area policy. - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. An indiscriminate height restriction would fail to optimise the full potential of all development sites (some of which may be suitable for taller buildings). - The NSP has a borough-wide policy regarding air quality. - Amended version notes the high proportion of affordable homes in the area. All development proposals will be required to provide new affordable housing as per the borough-wide affordable housing policy. - The Council cannot control when private developers implement schemes. However,
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housing.	the Council will ensure that development is well managed and minimizes adverse impacts to amenity during construction. Several Site Allocations in Bankside and The Borough include housing as an acceptable use.
Site Allocation consultation response summary	Council response
<p><u>NSP01: Site bordering Great Suffolk Street and Ewer Street</u></p> <ul style="list-style-type: none"> - Suggestions for general amendments of Site Allocation vision/text: <ul style="list-style-type: none"> - Text should acknowledge the fragmented site ownership and the subsequent implication that redevelopment may come at different times. <p>Employment provision:</p> <ul style="list-style-type: none"> - Recommendation that the employment provision of 50% should be based on net useable office floorspace which is a more accurate representation of the actual employment potential of the site. <p>Other:</p> <ul style="list-style-type: none"> - Potential water supply issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability. 	<ul style="list-style-type: none"> - The NSP Site Allocations do not reference site ownership. Firstly, site ownership is fluid. Secondly, Site Allocations represent a vision for future development. Optimal development outcomes will be achieved by bringing forward development proposals for Site Allocations in their entirety. The Council will support land owners to bring forward their sites for redevelopment. The Council accepts that some Site Allocations will be delivered in phases. - Noted. However, net useable floorspace will exceed GIA. The Site Allocation requires <u>at least</u> 50% of the development. Applicants could therefore exceed the 50% GIA by providing 50% net useable floorspace and this would not conflict with the Site Allocation. - Noted
<p><u>NSP02: 62-67 Park Street</u></p> <ul style="list-style-type: none"> - Sites in proximity to the Thames such as this one must take into consideration using the river as a resource for freight, construction, and passenger transport. - No water infrastructure/wastewater concerns. 	<ul style="list-style-type: none"> - Policy 6.14 of the London Plan promotes the use of the Thames for freight. - Noted
<p><u>NSP03: 185 Park Street –</u></p> <ul style="list-style-type: none"> - No waste water infrastructure concerns, the wastewater network capacity may be unable to support the demand anticipated from the Site Allocation. 	<ul style="list-style-type: none"> - Noted
<p><u>NSP04: London Fire and Emergency Planning Authority</u></p> <p>Administrative amendments to the Site Allocation:</p>	

<ul style="list-style-type: none"> - Site photo is incorrect - Site boundary incorrect - Site area is incorrectly listed - It is not correct to list the existing use as a fire station complex as it is currently vacant and has been since 2014 - Suggestions for general amendments of Site Allocation vision/text: <ul style="list-style-type: none"> - Several respondents have commented that this site in particular could benefit more from a school and other community uses rather than housing. - Respondent is concerned that if the current planning application is not granted (which follows many of the principles of the Site Allocation), the current wording of the Site Allocation is too restrictive as the other acceptable uses are listed as 'none'. <p>Capacity</p> <ul style="list-style-type: none"> - Potential water network capacity issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability. 	<ul style="list-style-type: none"> - Site photo has been changed in the PROPOSED SUBMISSION VERSION - The site boundary represents the development site to which the Vision applies. This does not exclude land outside the Site Allocation forming part of an application including the Site Allocation. - The site area corresponds correctly to the site boundary. - The existing uses have been updated to reflect the vacant status of the building. - Noted. A school is a required use. - Applications for alternative uses would consider whether there is a demand for the use required in the Site Allocation. - Noted
<p><u>NSP05: 1 Southwark Bridge and Red Lion Court</u></p> <ul style="list-style-type: none"> - Suggestions for general amendments of Site Allocation vision/text: <ul style="list-style-type: none"> - The indicative commercial floor space is too prescriptive. A more flexible approach to Indicative Development Capacities should be taken. - Respondent objects to the east-west pedestrian cycle route as well as the proposed open space as this would break up the site and would be unfavourable for any future redevelopment of the site. One respondent has suggested that the site vision diagram should explore other alternative site layouts and through routes. - Respondent does not agree that an east-west pedestrian route would be suitable as Southwark Bridge is of a significantly higher level and so level 	<ul style="list-style-type: none"> - The PROPOSED SUBMISSION VERSION removes indicative development capacities. It is accepted the optimum development capacity will be determined through detailed assessment forming part of an application. - The PROPOSED SUBMISSION VERSION removes the aspiration for an east-west link. - As above

<p>access would not be achievable.</p> <ul style="list-style-type: none"> - Potential water network capacity issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability 	<p>- Noted</p>
<p><u>NSP06: Land Bounded by Southwark Street, Redcross Way and Crossbones Graveyard</u></p> <p>Transport/connectivity routes:</p> <ul style="list-style-type: none"> - Many respondents have expressed concern over the potential north-south cycle route and pedestrian link through the site as the Crossbones Graveyard is a sensitive historical site. Some respondents have commented that a cycle route is more problematic than a pedestrian route, but altogether remains an issue in terms of tranquility and management. - Respondent has suggested the pedestrianisation of Redcross way which runs alongside Crossbones Graveyard. - Many respondents have argued that there should not be access through Maidstone Mews as it is no longer a public road as set out in the residential leases. However, several respondents have commented in favour of the east-west route as it would provide better access to the Landmark Court development. - Representation recommends the designation of a part of the site as a public open space and suggests that consideration is given to the part along Red Cross Way to the junction with Southwark Street and beneath the railway bridge spans which would provide connectivity with the Graveyard and would improve pedestrian and cyclist connectivity. - Suggestions for general amendments of Site Allocation text: <ul style="list-style-type: none"> - Respondent welcomes the inclusion of this site as it has a high development potential. - Recommendation to amend the residential provision text from 'must provide' to 'may provide'. 	<ul style="list-style-type: none"> - The PROPOSED SUBMISSION VERSION removes the aspiration for a north-south link and references the sensitive undesignated heritage asset of Crossbones Graveyard. - Stopping up of roads requires a detailed assessment of highways impacts. The NSP would not thwart this option should it be taken forward as a proposal. - The PROPOSED SUBMISSION VERSION removes the aspiration for a link through Maidstone Buildings to Borough High Street. - The site does not include an open space requirement because it is adjacent to Crossbones Graveyard which is proposed as new Other Open Space through the New Southwark Plan. - Noted - The PROPOSED SUBMISSION VERSION has amended the Site Allocations into three categories for land use. This includes land uses that should be provided and land uses that may be provided. Other land uses may also be acceptable as

<ul style="list-style-type: none"> - Respondent queries the overly prescriptive uses and would welcome a more flexible approach. - Text should confirm that any mix of the listed uses is acceptable as respondent feels that the Site Allocation requires all the uses listed. - Respondent has requested changes to the uses to enable a commercial-led redevelopment. - Respondent suggests that this Site Allocation has potential to be an open space use for an entrepreneurial hub which could provide residents with fresh food. - Respondents comment that any development height should be controlled to retain the open sky; with one respondent suggesting a 10 storey limit. - Due to the proximity to Guys Hospital, the respondent suggests that the policy include an element of low cost housing. - Respondent recommends that the policy is re worded to provide additional flexibility to the active frontages uses to enable a development in which can be successfully marketed and quickly occupied and suggests the following wording: "Town centre uses including a range of uses within the following Use Classes at ground floor level facing Southwark Street: A1 and / or A2 and / or A3 and / or A4 and / or D1 and / or D2." <p>Suggestions for general amendments of Site Allocation map:</p> <ul style="list-style-type: none"> - Recommendation to extend the Site Allocation boundary to include the graveyard to the south west as it forms part of the overall site. The site boundary may also need to be amended to include the Network Rail Land adjacent. Respondent has also commented that the boundary extends too far north and does not align with the proposed OOS designation. - Route layout should be marked as indicative as it will be dependent on the proposed scheme. 	<p>determined in the development plan</p> <ul style="list-style-type: none"> - The PROPOSED SUBMISSION VERSION amends the land use requirements to allow greater flexibility for an employment-led scheme. - The PROPOSED SUBMISSION VERSION amends the land use requirements to allow greater flexibility for an employment-led scheme. - The PROPOSED SUBMISSION VERSION amends the land use requirements to allow greater flexibility for an employment-led scheme. - The proposed Site Allocation would not preclude this use. - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. An indiscriminate height restriction would fail to optimise the full potential of all development sites (some of which may be suitable for taller buildings). - All residential development will be assessed against borough-wide affordable housing policies. - The PROPOSED SUBMISSION VERSION requires redevelopment to provide active frontages on Southwark Street with ground floor town centre uses (A1, A2, A3, A4, D1, and D2). - The PROPOSED SUBMISSION VERSION proposes open space protection for the graveyard. The graveyard shouldn't be included in any redevelopment proposals should be sensitive to the setting of the graveyard.
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<ul style="list-style-type: none"> - Recommendation to include a quantum requirement to set out the proportion of residential/office required as the respondent does not feel that this has been addressed. One respondent queries the specific floorspace figure listed as this may limit the development potential of this site. The respondent suggests that this applies to all Site Allocations. - Recommends an appraisal of the likely impacts on heritage assets. Respondent encourages the use of the councils Bankside, Borough and London Bridge characterisation study to determine the capacity of the site and in expanding the design and accessibility guidance for this Site Allocation. <p>Other:</p> <ul style="list-style-type: none"> - Potential water network capacity issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability 	<ul style="list-style-type: none"> - Throughout the plan all routes are indicative. However, the Site Allocation for Landmark Court has been removed. - The PROPOSED SUBMISSION VERSION removes indicative development capacities. It is accepted the optimum development capacity will be determined through detailed assessment forming part of an application. - The Site Allocation design and accessibility guidance notes the site is within a conservation area and designated and undesignated heritage assets. - Noted
<p><u>NSP07: Land Between Great Suffolk Street and Glasshill Street</u></p> <p>Transport/open spaces/ active frontages:</p> <ul style="list-style-type: none"> - Recommendation that the area within the Site Allocation which is currently a car park should be made into an open/green space. Open space has been described by many respondents as lacking in the area and Site Allocation. - Some respondents have said that a C1 use in the area would be inappropriate given the residential nature of the location and the number of other hotels in the area, whilst one other welcomes the opportunity for the potential of hotels. <p>Tall buildings:</p> <ul style="list-style-type: none"> - Residents have voiced concern about the potential effects that a development would have on access to sunlight. A height restriction of 10 storeys outside the core business areas was requested. 	<ul style="list-style-type: none"> - The Site Allocation is required to contribute towards the Low Line walking route. This will create new public amenity space. - A C1 is an acceptable use in this location. The site is within the Central Activities Zone and has high public transport accessibility. - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant

<ul style="list-style-type: none"> - Respondent recommends the retention of The Vodafone building based on its architectural merit. - Suggestions for general amendments of Site Allocation text: <ul style="list-style-type: none"> - The Site Allocation text should be amended to correctly reflect the mix of uses in the area rather than a strictly commercial description. - One representation asks to revise the existing floorspace as they believe that the draft Site Allocation is an overestimate of the actual floorspace. - The policy should be revised as the proposed 50% employment floorspace is too prescriptive. - Acceptable uses should be expanded to include community, Sui Generis and retail uses. This should not include student accommodation. - Respondent is concerned that Great Suffolk St Shopping parade would not benefit from more bars and restaurants and emphasizes that the residential nature of the area should remain unchanged. Another representation has suggested that active frontages should take into account the residential properties across from and adjacent to the Site Allocation. - Recommendation to develop this site as a boutique style hotel rather than offices. Potential for a hotel on this site was welcomed by several respondents. - Potential water network capacity issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability 	<p>considerations given the detailed design, location and context. An indiscriminate height restriction would fail to optimise the full potential of all development sites (some of which may be suitable for taller buildings).</p> <ul style="list-style-type: none"> - The Site Allocation provides for a range of uses which are reflective of the wider area. - The existing site uses have been reviewed and updated for the PROPOSED SUBMISSION VERSION . - The site is within the Central Activities Zone which is a suitable location for employment growth. Comprehensive redevelopment could achieve re-provision or an uplift in commercial uses alongside new homes. - The acceptable uses have been updated in the PROPOSED SUBMISSION VERSION to include communityspace. - The PROPOSED SUBMISSION VERSION Site Allocation only requires active frontages with commercial or communityuses opposite the railway viaduct on the Low Line route. - A C1 is an acceptable use in this location. The site is within the Central Activities Zone and has high public transport accessibility. - Noted
<p><u>New Policy: NSP67 Swan Street Cluster</u></p> <p>General comments to the amended policy:</p> <ul style="list-style-type: none"> - Respondent encourages the plans for the Swan Street area but wishes to ensure that the area does not lose its residential setting and that resident's amenity is safeguarded. 	<ul style="list-style-type: none"> - The Site Allocation requires a mixed use scheme including new homes. Any redevelopment should respond to the character of the area.

<ul style="list-style-type: none"> - One representation objects to the hotel as there are 4 other hotels in the vicinity. - Recommendation by 2 representations to preserve and incorporate the mural in Avon Place in any new development and to retain the 'warehouse' character to the frontage along Cole Street. - Respondent welcomes the inclusion of this site since future use of this site is unsettled in the long-term and the present building is of relatively poor quality. - Respondent does not envisage any future water supply capability or wastewater infrastructure capability issues. <p>Transport:</p> <ul style="list-style-type: none"> - Suggestion to incorporate a cycle way on Harper Road and recommendation to work with TFL to improve road safety in the area including redirecting HGVs and monitoring traffic speed and improving the pedestrian crossing facilities at the junction with Long Lane. Respondent also suggests restricting the access for cyclists to cross Great Dover Street as this slows the traffic flow on the main road. One respondent comments that development should be managed so it doesn't increase traffic flows for vehicles avoiding the Elephant, Borough Station and St George's Circus junctions. - Whilst not a proposal suggested by the Site Allocation, the respondent would like to object to any connectivity routes through the Britannia House site as there is an existing route along Avon Place which provides adequate permeability and a through route would further reduce the site's development capacity. - Respondent welcomes the improvement of pedestrian and cyclist connectivity. <p>Suggested amendments to Site Allocation text:</p> <ul style="list-style-type: none"> - Recommendation to include more housing and office space; one respondent would welcome a focus on employment uses with at least as much office space being retained but welcomes the introduction of other uses 	<ul style="list-style-type: none"> - The Site Allocation does not include a hotel as a preferred land use. Applications for land uses not listed will be assessed against borough-wide planning policies. - The side of Cole Street with a 'warehouse' character is not included in the Site Allocation. The existing building in the Site Allocation on Cole Street does not have a 'warehouse' character. Any redevelopment should respond to the context particularly within the setting of conservation areas. - Noted - Noted - Transport impacts and mitigation will be addressed in accordance with the borough-wide policies. - Noted. - Noted. The Site Allocation provides for a comprehensive mix of uses including new housing.
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<ul style="list-style-type: none"> - Whilst the existing office space retention is welcomed, the respondent considers that the draft policies should recognise that 200 Great Dover Street has an opportunity to increase employment provisions and incorporate other acceptable uses; respondent is therefore concerned about the treatment of the sites as one and recommends the amendment of the Site Allocation text to read: <ul style="list-style-type: none"> • Office (B1a) – an increase over and above existing to optimise these highly accessible sites within the CAZ. • Higher Education (D1) – at least as much as currently, where existing. • Town centre uses (A1, A2, A3, A4, D1, D2) – 4-5000 sqm. • Residential (C3) – over 150 homes.” - Respondent suggests amending the text to encourage public realm improvements. - Respondent suggests that a mixed-use approach is the most suitable basis for future redevelopment and therefore suggests the employment provision be amended to be more flexible facilitate a mixed use development and presently the policy restricts the ability to introduce new uses. Additionally, the respondent questions whether there will be market demand for alternative employment use in a residential location in the absence of King’s College. A mixed use scheme would be more efficient in providing a satisfactory transition from the commercial Newington Causeway to the residential Swan Street/Trinity Church Square. Respondent suggests this wording: “Redevelopment of the Britannia House site should provide for commercial and/or educational uses or, alternatively, should bring forward a mixed-use scheme containing as much employment floorspace as is consistent with introducing a balanced mix of new uses.” <p>Suggested amendments to Site Allocation map:</p> <ul style="list-style-type: none"> - Respondent welcomes the connectivity improvements indicated but suggests that the new public space is given more consideration in respect of 200 Dover Street as suggesting a third of the site is public open space is unjustified on a site with an ‘island effect’ and risks preventing redevelopment from taking place especially since intensification is being 	<ul style="list-style-type: none"> - Noted. The Site Allocation has been amended to require Re-provide at least the amount of employment floorspace (B class) currently on the site or, provide at least 50% of the development as employment floorspace, whichever is greater. - The design and accessibility guidance provides guidance about public realm enhancements. The suitability of specific public realm improvements will be assessed based on the characteristics of any development proposal through the application process. - Noted. The Site Allocation provides for a comprehensive mix of uses including new housing. - The PROPOSED SUBMISSION VERSION Site Allocation has removed the requirement to provide new open space.
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<p>sought.</p> <p>Conservation/residential area:</p> <ul style="list-style-type: none"> - Many respondents objected to the inclusion of taller buildings from the site as this will detract from the residential nature of the area and negatively impact the Trinity Square Conservation Area. One respondent requests incorporating good design and ensure consistency with the surrounding area, particularly the Trinity Church Conservation Area. - As Britannia house is the 'gateway' to the conservation area, the respondent requests that the development be in keeping with the Georgian Architecture that it contains; respondent suggests using the development at 18-30 Trinity Street as an example. - Respondent welcomes the inclusion of 200 Great Dover Street as the building is dated and detracts from the Conservation area and Grade II listed St George Church. Respondent confirms that the existing buildings have varying leases but these all come to an end from May 2018 onwards. - Respondent welcomes the references to the designated heritage assets and APZ but queries the inclusion of taller buildings without more details and tested appropriate height indications. - Respondent requests the protection of the mature trees on the western footway. - Recommendation to amend the text to recognise that each site has different site specific consideration and some flexibility will therefore be needed when assessing proposals for each site. <p>Active frontages:</p> <ul style="list-style-type: none"> - Suggestion to rethink active frontages as respondent states that there are many underused active frontages on Borough High Street and any more would bring about additional noise and disruption to the area. - Respondent opposes to the inclusion of further restaurants and bars at the north end of Swan Street as these include many private dwellings (including at pavement level) and these uses will create noise and disturbance to the residents. 	<ul style="list-style-type: none"> - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. The design and accessibility guidance notes redevelopment must enhance the setting of listed buildings and conservation areas in the vicinity of the site. - The design and accessibility guidance notes redevelopment must enhance the setting of listed buildings and conservation areas in the vicinity of the site. It would be unduly prescriptive to establish narrow design criteria through a Site Allocation. - Noted - As above. - All applications affecting mature trees will be assessed against borough-wide trees policy. - The design and accessibility guidance indicates that each site has different characteristics. - Noted. - The Site Allocation includes town centre uses on Swan Street. However, the appropriateness of specific uses will be determined through detailed design at the application stage.
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<ul style="list-style-type: none"> - Respondent has commented that two of the sites front Great Dover Street which is part of the strategic road network and as such, these must allow for all day servicing and provide enough set back to allow for tables and chairs associated with the active frontages to be placed off the public highway as well as protect the existing docking station in Swan Street for the expansion of the cycle hire. <p>Building height/density:</p> <ul style="list-style-type: none"> - Many respondents have commented that there should be no developments with heights exceeding current building heights. - One respondent suggests that for 200 Dover Street, there will need to be intensification to viably develop the site as given the history and location, planning permission for taller buildings have a history of being refused on this site. In such a central area with a PTAL rating of 6b, increased densities would be appropriate subject to design considerations. <p>CIL /S106 funding to improve public realm:</p> <ul style="list-style-type: none"> - Respondent asks for any development of Britannia house and/or Pegasus house to include funding for the laying of new artificial stone paving on the west side of Swan Street, north of the Trinity Street junction and the east side of Swan Street north of the Trinity Street junction up to the junction with Cole Street. Similarly, respondent asks that CIL money related to development of buildings owned by Trinity House be allocated to complete the replacement of existing pavements in the conservation area 	<ul style="list-style-type: none"> - Noted. Applications will be assessed against borough-wide policies relating to servicing of development. - As above - As above - Noted.
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Bermondsey consultation Summary

Area Vision consultation response summary:	Council response
<ul style="list-style-type: none"> - Suggestions for general amendments Area Vision text: - Area Vision should include a reference to the Conservation Area Management plan to ensure its recognition by the Council's Planning System. - Respondent has requested to remove the reference to Rotherhithe as this may cause confusion to the reader, suggesting it should be referred to only 	<ul style="list-style-type: none"> - PROPOSED SUBMISSION VERSION has been updated to note the Conservation Area Management Plan - Noted. Council does not consider the reference to Rotherhithe Docs may confuse.

<p>as 'docks'.</p> <ul style="list-style-type: none"> - Reference should be made to Bermondsey being located within Flood Zone 3 and is therefore vulnerable to tidal flooding. - More efforts should be made to provide affordable space for small and young businesses as respondents are concerned that the Site Allocation will be disruptive to the operation of small businesses. - Development in Bermondsey should also encourage the opening of more pizza restaurants. - Respondent has expressed that the plan proposes too few Site Allocations. - One respondent has expressed their disappointment in the Vision for the area as more focus should be given to density existing housing estates and develop brownfield land. - Suggestions for general amendments of Site Allocation map: Bermondsey Area Vision map has been described as vague and imprecise. - Recommendation to create a separate Vision for Tower Bridge Road and the triangle bounded by A2, A3 and the A201. - There are concerns about a mixed-used vision for Bermondsey and a commercial vision for London Bridge overlapping and causing confusion. One respondent has suggested that an explicit reference be made to the overlapping of Area Visions. NSP53 should be made both more visible but also labelled within the Bermondsey Area Vision map. <p>Transport:</p> <ul style="list-style-type: none"> - Additional measures to improve air quality should be included within the Area Vision in addition to support for cycling and walking. - The plan should address the Jamaica Road/ Rotherhithe Tunnel Congestion. - Given the area's proximity to the River Thames, more emphasis should be 	<ul style="list-style-type: none"> - The borough-wide flooding policy shows the Flood Zones across the borough. - The PROPOSED SUBMISSION VERSION incorporates an aspiration for development to 'provide flexible workspaces for small and medium enterprises, particularly creative' - Larger development sites allow new town centre uses which may include restaurants. - Site Allocations were selected and developed according to a consistent methodology which is set out in the evidence base. - The Vision for Bermondsey is to 'provide as many homes as possible while respecting the local character' - The PROPOSED SUBMISSION VERSION updates the Area Vision maps to aid clarity. - Noted. The NSP proposes a new Town Centre for Tower Bridge Road. - The PROPOSED SUBMISSION VERSION changes the Area Vision Maps to show a wider context. Both Bermondsey and London Bridge have a mixed-use vision. It should be noted that all of London Bridge is in the CAZ whilst only part of Bermondsey is in the CAZ. - Air quality improvements are a borough-wide priority and development will be assessed against the borough-wide policy. The Bermondsey Area Vision does include aspirations for improved cycle and walking routes.
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<p>given to the use of the river as a transport/freight resource.</p> <p>Tall buildings:</p> <ul style="list-style-type: none"> - Many respondents have commented against the inclusion of high-rise within the Bemdsey area and one respondent asks for clarification of the terms “taller” and “appropriate location”. Another has requested the reinstating of a 10 storey height restriction outside of the core business area. - The Vision needs to make specific references to building heights to protect local views. 	<ul style="list-style-type: none"> - The Area Vision includes a commitment to improve traffic flow on the road network, particularly on Jamaica Road. - The London Plan supports the use of the River Thames for transport and freight. - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. An indiscriminate height restriction would fail to optimise the full potential of all development sites (some of which may be suitable for taller buildings). The Core Strategy does not include a 10 storey height restriction. - The borough-wide policy Borough views include detailed guidance for how local views should be protected and enhanced.
<p>Site Allocation consultation response summary:</p>	<p>Council response</p>
<p><u>NSP08: Biscuit Factory and Campus</u></p> <ul style="list-style-type: none"> - Suggestions for general amendments of Site Allocation vision/text: <ul style="list-style-type: none"> - Reference should be made to the Blue in order ensure that its current uses (retail, commercial, and community uses) are not negatively impacted. - This site is not situated in a town centre and therefore the requirement for town centre uses on this site is not in conformity with the London Plan. - The potential ‘overdevelopment’ of the site was one point raised by several respondents with some explicitly mentioning the number of new homes suggested by the Site Allocation. - Recommendation to amend the main text to include the re-provision of businesses space for SMEs to support employment in the area as the relocation of local businesses to the area is a concern. - Respondent has commented that it is essential that the policy ensures that 	<ul style="list-style-type: none"> - The Site Allocation has been amended to make specific reference to the need to ensure development would not adversely impact core retail function of The Blue. - The site is in an edge of town centre location and has significant and substantial opportunities for comprehensive redevelopment. The site will accommodate at least 1,500 new homes and improve permeability and public realm within the site and surrounding area. The site can accommodate a complementary offer to the retail function of The Blue. - The Site Allocation reflects the extant planning permission. - The PROPOSED SUBMISSION VERSION requires new and replacement business floorspace.

<p>a significant proportion of the 1500 proposed houses are affordable and available for local people.</p> <ul style="list-style-type: none"> - Respondent is supportive of the Site Allocation but recommends a strengthening of the business floorspace within the draft policy. - Respondent recommends that the first two bullet points are replaced with the following: <ul style="list-style-type: none"> ▪ Deliver a comprehensive mixed use development including at least 1,500 new homes. ▪ Support new and replacement business floorspace, including space for small and medium enterprises. Provide a replacement secondary street. <p>Traffic/connectivity:</p> <ul style="list-style-type: none"> - Respondents have raised concern that the Jamaica Road area is an already congested area and the development of such a large site will only further the traffic and congestion problems. The presence of only one entrance at the Bermondsey Tube station was also raised as problematic and questions whether this will be sufficient to sustain an increase in numbers of additional commuters. - Further points have been raised regarding traffic issues in the area including parking problems for existing and prospective residents with only a minimum parking provision being required by the Site Allocation. <p>Infrastructure capacity:</p> <ul style="list-style-type: none"> - Potential water network capacity issues. Recommendation to work together with organization to understand infrastructure requirements of sites. Local upgrades to existing drainage may be required to support the anticipated demand. 	<ul style="list-style-type: none"> - All major residential developments must provide affordable homes as per the borough-wide affordable housing policies. - All major residential developments must provide affordable homes as per the borough-wide affordable housing policies. - PROPOSED SUBMISSION VERSION amended to reflect the comment except the replacement secondary street (which is unclear). - The Area Vision for Bermondsey seeks to improve surface transport, particularly on Jamaica Road. All development proposals will be assessed against borough-wide public transport policies which may require development to improve, maintain and enhance public transport services. <p>All development proposals will be assessed against borough-wide public highways impacts policies and demonstrate that the road network has sufficient capacity to support any increase in the number of the journeys by the users of the development.</p> <ul style="list-style-type: none"> - Noted
<p><u>NSP09: Tower Workshops</u></p> <p>Active frontages:</p> <ul style="list-style-type: none"> - One representation has voiced concern over the proposed active frontages on Maltby Street stating that this will have significant impacts on a predominantly residential area. It was also stated that as Maltby Street is 	<ul style="list-style-type: none"> - The Site Vision requires active frontages on Maltby Street. However, the PROPOSED SUBMISSION VERSION has amended the site vision to remove opportunity for town centre uses on Maltby Street.

<p>narrow, there is little prospect for outdoor seating.</p> <ul style="list-style-type: none"> - Existing businesses and Light industrial uses: <ul style="list-style-type: none"> - Many respondents have stated that the intensification of land for residential purposes will come to the detriment of valuable light industrial spaces. - Redevelopment should aim at facilitating the relocation of existing businesses through capped rents and should consider phased development to minimise disruption to business operations. - Many businesses within Tower Workshops have commented that the Tower Workshops is an established employment cluster with many local ties, and its re-provision is uncertain as a result of the draft plan as the policy does not meet the needs of the businesses with specific spatial requirements. - It was suggested that the text should make reference to other B uses as not all businesses satisfy the B1 use class. One respondent has suggested that the future development also includes mixed employment use for micro and SME enterprises including B1c accommodation. - Suggestions for general amendments of Site Allocation vision/text: <ul style="list-style-type: none"> - One respondent has stated that the inclusion of town centre uses is not in conformity with the London Plan as the site is an out-of-centre location. - Council should provide support for the businesses at Tower Workshops. <p>Infrastructure capacity:</p> <ul style="list-style-type: none"> - Potential water network capacity issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability 	<ul style="list-style-type: none"> - The Site Vision requires any redevelopment to provide at least the amount of employment floorspace currently on the site. - Noted. Any development would be assessed against the borough-wide policy Business relocation. - Noted. Any development would be assessed against the borough-wide policy Business relocation. - Noted. The PROPOSED SUBMISSION VERSION notes that the existing uses are 'small business space' B1. - The Site Vision requires active frontages on Maltby Street. However, the PROPOSED SUBMISSION VERSION has amended the site vision to remove opportunity for town centre uses on Maltby Street. - Noted. Any development would be assessed against the borough-wide policy Business relocation. - Noted
<p><u>NSP10: Land between West Lane, Jamaica Road and Marigold Street</u></p>	<p>- Site Allocation is not part of the Proposed submission version of the New Southwark Plan.</p>
<p><u>NSP11: Chambers Wharf</u></p> <ul style="list-style-type: none"> - Suggestions for general amendments of Site Allocation vision/text: <ul style="list-style-type: none"> - The existing uses should be amended to reflect that the site is being fully 	<ul style="list-style-type: none"> - Existing uses have been amended to reflect the site's use for the construction of

<p>used for constructing the Thames Tideway Tunnel by the current users, Bazalgette Tunnel Ltd, until 2023 instead of incorrectly listing the site as vacant.</p> <ul style="list-style-type: none"> - The Thames walkway should be extended to link up with the access to the river in front of Luna House to provide an improved (uninterrupted) Thames Path. - Tall Buildings: <ul style="list-style-type: none"> - Tall buildings should be located at least one block away from the river bank. <p>Infrastructure capacity:</p> <ul style="list-style-type: none"> - Potential water network capacity issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability. 	<p>the Thames Tideway Tunnel.</p> <ul style="list-style-type: none"> - Noted. The PROPOSED SUBMISSION VERSION requires the site to improve the Thames Path. All development within the Thames Policy Area should improve and create access to the riverfront. - The borough-wide River Thames policy requires tall buildings to be set at least one block back from the Thames. - Noted
<p><u>NSP12: 21 and 25-29 Harper Road</u></p> <p>Amendments to Site Allocation text/map:</p> <ul style="list-style-type: none"> - Recommendation to extend the site boundary to include the Old Court house. - There is currently an ongoing planning application matching the boundary of the Site Allocation (excluding the sorting office). - Site Allocation text incorrectly suggests that the site is located within the Trinity Church Conservation Area. - One representation requests a more explicit reference within the text for the re-provision of social infrastructure rather than just D1. - Active frontages should be restricted to Borough High Street and not Harper Road. - Site Allocation uses: <ul style="list-style-type: none"> - Respondent has commented that a hotel should not be constructed on site 	<ul style="list-style-type: none"> - The Council does not consider the Court to be a redevelopment site. It is in use as a court and it is a listed building. - The site boundary has been amended to remove the south-eastern portion which benefits from an independent planning permission. - Noted. PROPOSED SUBMISSION VERSION has been updated to note the site is within the setting of Trinity Church Square Conservation Area. - The amended Site Allocation requires the re-provision at least the amount of employment floorspace (B class) currently on the site re-provide at least 50% of the development as employment floorspace, whichever is greater. This may include D1 space. - The amended Site Allocation only requires active frontages on Borough High Street. - Applications for hotels (C2) will be assessed against the borough-wide hotels

<p>as a large hotel has been approved along Newington Causeway and another has just been completed on Borough High Street.</p> <ul style="list-style-type: none"> - Policy should allow for greater flexibility in uses to allow for the Site Allocation to permit other types of residential uses/concepts. - - Tall buildings: <ul style="list-style-type: none"> - Two respondents have commented against the inclusion of taller buildings within this Site Allocation. One representation suggests that developments should include height limitations to recognise the conservation area adjacent. - Employment requirements: <ul style="list-style-type: none"> - Any new development should promote small businesses/create employment. <p>Traffic/ connectivity</p> <ul style="list-style-type: none"> - Site Allocation should include traffic calming measures on Harper Road and Brockham Street. The Southern Spine Cycleway linkage should be implemented prior to any development to avoid any safety conflicts. - - No water infrastructure or wastewater concerns anticipated. 	<p>policy.</p> <ul style="list-style-type: none"> - The Site Allocation in the PROPOSED SUBMISSION VERSION requires the provision of new homes. Applications for other types of residential uses/concepts will be assessed against borough-wide planning policy. - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. An indiscriminate height restriction would fail to optimise the full potential of all development sites (some of which may be suitable for taller buildings). The Core Strategy does not include a 10 storey height restriction. - The amended Site Allocation requires the re-provision at least the amount of employment floorspace (B class) currently on the site re-provide at least 50% of the development as employment floorspace, whichever is greater. This may include small business space. - All development proposals will be assessed against borough-wide public highways impacts policies and demonstrate that the road network has sufficient capacity to support any increase in the number of the journeys by the users of the development. - Noted
<p><u>NSP66: Discovery Business Park and Railway Arches</u></p> <p>General comments to the amended policy:</p> <ul style="list-style-type: none"> - Two respondents agree with the proposal and support the continued use of the Business Park. <p>Transport:</p> <ul style="list-style-type: none"> - Two representations have recommended amending the site vision diagram to indicate the opportunity for improved cyclist/pedestrian routes under the railway lines as well as alongside (Low line) which would help overcome severance of the viaduct. One other respondent has suggested amending the design and accessibility guidance to mention improved cycle/pedestrian routes and to facilitate Cycle Hire expansion. An improved South-west to 	<p>Site removed from the PROPOSED SUBMISSION VERSION</p>

<p>north-east bus connectivity should also be considered.</p> <ul style="list-style-type: none"> - Respondent is concerned that the map indicates a high number of parked cars and suggests including a car parking guidance. 	
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Blackfriars Road Consultation Summary

Area Vision consultation response summary:	Council's response.
<p>Amendments to Site Allocation text/map:</p> <ul style="list-style-type: none"> - Several respondents have commented that the draft text requires various amendments including rewording the description of Blackfriars Road as one respondent feels like it creates a "bias towards larger businesses". - Respondent has argued that the final bullet point of paragraph 7.1.1 is untrue as they believe that bus and freight demands are not well managed. - Recommendation that development management and enforcement policies should be established as much of a vision for Blackfriars Road was covered in the SPD and since then there have been several breaches. - Area Vision should include design which provides opportunities for improved/green public spaces and more trees. The broad roads provide many opportunities to improve the transport and character of the area. The lack of public realm and safe/enjoyable linkages was raised by one other respondent as well. One respondent has commented that existing open spaces should also be improved. - The Area Vision should include the surrounding streets (The Cut, Union Street, Stamford Street and Southwark Street) to protect and bring about change to the area as a whole. - Impacts on area and heritage assets: <ul style="list-style-type: none"> - Respondent is concerned that recent development has contributed to considerable amounts of anti-social behaviour. - Respondent would like the Area Vision to emphasise the impact of development on adjacent historic buildings/areas as well as residential 	<ul style="list-style-type: none"> - Blackfriars Road is one of the key employment sites in Southwark due to its central London location in the CAZ. The Area Vision also notes the area is characterized as being a mixed use area where people live. - Blackfriars Road has recently undergone extensive works to improve the quality of public transport. - Noted - The PROPOSED SUBMISSION VERSION Area Vision includes an aspiration to improve existing open spaces, specifically Christ Church, Nelson Square and Paris Gardens and to provide more linkages and improvements to the streetscape including lighting, seating and greening. - The Area Visions should not be read in isolation. - Noted. The PROPOSED SUBMISSION VERSION Area Vision includes an aspiration to provide more linkages and improvements to the streetscape including lighting, seating and greening, to make journeys both along and across the road and surrounding neighbourhoods safer. - The SPV Area Vision requires development to protect and positively respond to

<p>communities.</p> <ul style="list-style-type: none"> - Many Site Allocations are in close proximity to Christ Church Parish Church and respondent is concerned over the integration of new developments alongside the existing community/worship uses. - - Connectivity and transportation: <ul style="list-style-type: none"> - Traffic systems are needed to relieve congestion in the area; the current transport-led scheme for Blackfriars road is insufficient. - Cycling and walking should be strongly supported in addition to the implementation of air quality strategies. - Development requirements: <ul style="list-style-type: none"> - Developments should be varied to cater to the needs of existing and future residents as respondent considers there are too many pubs and restaurants. - Whilst employment spaces are welcomed, respondent feels the need to include references to incubation and local employment places. - Due to its location within the BID, the respondent suggests an increase in the number of homes (including affordable housing) and new employment floorspace. - Tall Buildings: <ul style="list-style-type: none"> - Many respondents have requested the reinstatement of height limits or a statement of intent to set limits on individual Site Allocations. One respondent has commented that a clearer strategy for building heights should be included to have a more comprehensive order to tall buildings. - There is no need to have a gateway at the southern end of Blackfriars Road; current building heights must be retained. - - Design and accessibility guidance: <ul style="list-style-type: none"> - Recommendation to encourage more traditional frontages. 	<p>the character and historic value of the surrounding residential areas.</p> <ul style="list-style-type: none"> - All development proposals must protect and positively respond to the character and historic value of the surrounding residential areas. - Noted. - Noted. - The Area Vision provides for a wide variety of uses in Blackfriars Road to reflect its multifunctional character and its opportunity as a part of Central London. - The Area Vision includes an aspiration to provide new workspace, particularly flexible business space, cultural, leisure, arts, entertainment and community facilities. - Noted. The Area Vision seeks to achieve this. - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. An indiscriminate height restriction would fail to optimise the full potential of all development sites (some of which may be suitable for taller buildings). The adopted Development Plan does not include height restrictions. - The Blackfriars Road SPG provides detailed urban design guidance. - Frontages will be assessed against the borough-wide policy for shop fronts. All
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	development should be appropriate to the context.
Site Allocation consultation summary	Council response
<p><u>NSP 13: Conoco house, Quadrant House, Edwards House and Suthring House</u></p> <p>Amendments to Site Allocation vision/general text:</p> <ul style="list-style-type: none"> - One respondent has suggested that the redevelopment should include plans to replace the Almshouses which are located within the site boundary and provide a solution for the current residents in the case of a redevelopment. - The Site Allocation should reflect other uses deemed appropriate within the CAZ and the OA. - Tall Buildings: <ul style="list-style-type: none"> - The comprehensive redevelopment should not encourage taller buildings. <p>Infrastructure capacity:</p> <ul style="list-style-type: none"> - Potential water network capacity issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability 	<ul style="list-style-type: none"> - The PROPOSED SUBMISSION VERSION site vision requires any redevelopment to re-provide or where not possible relocate Edward Edwards Almshouses. - The Site Allocation reflects the Council's aspiration for the site. Applications for other uses will be assessed against relevant policies in the Development Plan. - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. An indiscriminate height restriction would fail to optimise the full potential of all development sites (some of which may be suitable for taller buildings).
<p><u>NAP14: Telephone exchange and 50-60 Blackfriars Road</u></p>	<p>The long-term free holder has stated that there are no prospects of redevelopment within the plan period. The Site Allocation has therefore been removed.</p>
<p><u>NSP15: Friars House: 157 – 168 Blackfriars Road</u></p> <p>Amendments to Site Allocation vision/general text:</p> <ul style="list-style-type: none"> - It has been suggested that an open space should be proposed to replace the current car park currently situated to the rear of the car site. - Recommendation to amend the site boundary to include the under-utilised car park to the rear of the building. - Site Allocation text should include a reference to the fragmented site ownership to show that the re-development of the whole site is unlikely to come forward at the same time. 	<ul style="list-style-type: none"> - Any re-development must provide amenity space and contribute towards enhancing public realm. - The site boundary does include the car park towards the rear of the building. - Comprehensive redevelopment can be best achieved by bringing forward the whole site for redevelopment. As such developers should seek to assemble the site for comprehensive redevelopment. However, if the site cannot be brought together for redevelopment this would not preclude development of parts of the site.

<ul style="list-style-type: none"> - Traffic/connectivity issues: <ul style="list-style-type: none"> - Traffic mitigation measures should be implemented to address traffic issues on Webber, Silex, Boyfield and Lancaster streets. - Tall buildings: <ul style="list-style-type: none"> - The Site Allocation should not include tall(er) buildings. - Other comments: <ul style="list-style-type: none"> - One respondent highlighted that Friar's House has recently undergone a refurbishment; any redevelopment would cause disruptions to the area and the residents. - Potential water network capacity issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability. - Heritage assets: <ul style="list-style-type: none"> - Respondent has requested to confirm the status of the Foundry Building and whether it has been identified on a 'Local list'. - Indicative policy provisions: <ul style="list-style-type: none"> - Representation suggests that the proposed 50% employment floorspace is too prescriptive. - Respondent has stated that the Site Allocation documents should be in accordance with the NPPF and Site Allocations and should not be creating additional policies for development proposals. 	<ul style="list-style-type: none"> - All development proposals will be assessed against borough-wide public highways impacts policies and demonstrate that the road network has sufficient capacity to support any increase in the number of the journeys by the users of the development. - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. An indiscriminate height restriction would fail to optimise the full potential of all development sites (some of which may be suitable for taller buildings). - In the event Friars House is brought forward for redevelopment the Council would ensure impacts are mitigated where possible. The Council cannot prevent sites for coming forward for redevelopment. - Noted. - The Council does not have a 'Local List'. The Foundry Building is noted in the design and accessibility guidance for the Site Allocation as an undesignated heritage asset. - Noted. The Site Allocation has been amended to set out the need for employment floorspace in this location. Redevelopment proposals will be assessed in consideration of the merits of the scheme and any site-specific circumstances. - The purpose of a Site Allocation is to set out acceptable parameters of development.
<p><u>NSP16: Land enclosed by Columbo Street, Meymott Street and Blackfriars Road</u></p> <p>Amendments to Site Allocation vision/general text:</p> <ul style="list-style-type: none"> - The Site Allocation fails to mention that Columbo Centre provides affordable sports and leisure facilities that should be retained within any 	<ul style="list-style-type: none"> - The amended Site Allocation requires the retention or re-provision of the existing community use.

<p>redevelopment. Recommendation to include this within the Site Allocation vision and required uses.</p> <ul style="list-style-type: none"> - Site Allocation fails to mention the conservation adjacent in Lambeth. - - - - - - - Hotel provisions: <ul style="list-style-type: none"> - Given the site proximity to the cluster of hotels in Waterloo, there are concerns about the proposal to provide C1 (Hotel) uses. <p>Infrastructure capacity:</p> <ul style="list-style-type: none"> - Potential water network capacity issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability. 	<ul style="list-style-type: none"> - The Site Allocation design and accessibility guidance has been amended to recognise development proposals must recognise the site's close proximity to the borough boundary and must consider the setting of heritage assets in Lambeth, in addition to any cross-boundary issues and the provisions of policies and Site Allocations within reasonable proximity of the site as set out in the Lambeth Local Plan. - The amended Site Allocation does not cite hotel uses as a preferred use. However, applications for hotel uses (or any uses not identified in the Site Allocation) will be assessed against borough-wide planning policies. - Noted
<p><u>NSP17: Ludgate House and Sampson House, 64 Hopton Street</u></p> <p>Parking/transportation:</p> <ul style="list-style-type: none"> - Respondent suggests the removal of the large parking requirements within an area with such high PTAL rating. - Creation of additional through-routes within the site would be welcomed. - - - Other comments: <ul style="list-style-type: none"> - One respondent has expressed the difficulty to deduce from the Site Allocation whether the current community uses will be safeguarded within a redevelopment. - Respondent is concerned about the Site Allocation as the Sampson House building is a good example of Brutalist architecture. It was suggested that Sampson house can be retained and converted into a hotel. - Potential water network capacity issues. Recommendation to work together with organization to understand infrastructure requirements of sites. Local upgrades to existing drainage may be required to support the anticipated demand. 	<ul style="list-style-type: none"> - The site benefits from an extant planning permission which provides parking. The amended Site Allocation removes parking as a preferred land use. However, applications for any uses not identified in the Site Allocation will be assessed against borough-wide planning policies. - The Site Allocation requires any redevelopment to provide community and leisure uses (D1, D2) for the benefit of new residents and the existing local community. - The Site Allocation benefits from an extant planning permission. - Noted

<ul style="list-style-type: none"> - Tall buildings: <ul style="list-style-type: none"> - Respondent is opposed to high rise buildings because of wind issues. - - - - - <p>Amendments to Site Allocation vision/general text:</p> <ul style="list-style-type: none"> - Respondent is concerned about the quantity of active frontages proposed. - Recommendation to open up the space for smaller uses. 	<ul style="list-style-type: none"> - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. An indiscriminate height restriction would fail to optimise the full potential of all development sites (some of which may be suitable for taller buildings). - Noted - The Site Allocation benefits from an extant planning permission.
<p><u>NSP18: Southwark Station and 1 Joan Street.</u></p> <ul style="list-style-type: none"> - Tall buildings: <ul style="list-style-type: none"> - Respondents have voiced concerns over the impacts of taller buildings with particular reference to the impact on the character of Joan Street. A height limit of 70m should be implemented on any building above the station as per the Blackfriars Road SPD. - Height limits should be made clear within the document; the site description should also reflect the recently permitted 50 storey buildings as it is relevant to height context within the area. - - Site Allocation uses: <ul style="list-style-type: none"> - 'Other acceptable uses' should include a cultural space provision. - Site Allocation text should suggest that all town centre uses provided on-site should be amended as this may be neither practical nor viable. - The indicative development capacity is too specific and will limit the development opportunity. 	<ul style="list-style-type: none"> - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. An indiscriminate height restriction would fail to optimise the full potential of all development sites (some of which may be suitable for taller buildings). - As above. - The amended Site Allocation identifies cultural space provision as a preferred use. - Noted. The Site Allocation has been amended to set out the need for employment floorspace in this location. Redevelopment proposals will be assessed in consideration of the merits of the scheme and any site-specific circumstances. - All sites in the PROPOSED SUBMISSION VERSION have removed the indicative development capacity as it caused confusion that it represented a minimum and maximum quantum of acceptable development. The acceptability of any development proposal in terms of massing, scale and design will be subject to the same development management policies, as set out in the New Southwark Plan.

<ul style="list-style-type: none"> - Bars in Joan Street or facing the inside of the viaduct should be discouraged. <p>Amendments to Site Allocation vision/general text:</p> <ul style="list-style-type: none"> - Respondent welcomes the inclusion of this Site Allocation within the plan. - One respondent has commented that the site boundary should be amended to include the residential Chalets. - One representation questions the policy's requirement for the retention of employment space as they consider that there are none. Similarly, respondent questions the reference to mature boundary trees within the area as they not consider that there are any trees matching this description on site. - The provision of a new public open space adjacent to the station would be welcomed by one respondent. However, another has asked to omit any reference to Isabella Street as it has not identified for a particular use and the Site Allocation bordering Isabella Street will be difficult to redevelop due to the presence of the atrium structure. <p>Infrastructure capacity:</p> <ul style="list-style-type: none"> - Potential water network capacity issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability. 	<ul style="list-style-type: none"> - The Site Allocation does not include an aspiration for bars on Joan Street. The adjacent railway viaduct is not included as part of the Site Allocation but it falls on the indicative Low Line walking route. - Noted - That the Site Allocation does not include the 'chalets' to the south-west of the site does not preclude their forming part of a combined redevelopment proposal. However, the Council will not expect any application for the Site Allocation to demonstrate it has sought to bring forward an application for the Site Allocation alongside the 'chalets'. The 'chalets' are currently in residential use and the land owner, Southwark Council, has not committed to make them available for redevelopment. - Noted. Reference to mature trees has been removed. Part of the site is in employment use; temporarily as an arts space. - The site borders Isabella Street. Any redevelopment should contribute towards public realm improvements on surrounding streets, including Isabella Street. - Noted
<p><u>NSP19: McLaren House, St George's Circus</u></p> <p>Traffic / connectivity:</p> <ul style="list-style-type: none"> - Traffic mitigation measures should be implemented to address current traffic issues. - A segregated cycle path on Waterloo Road should be proposed. 	<ul style="list-style-type: none"> - All development proposals will be assessed against borough-wide public highways impacts policies and demonstrate that the road network has sufficient capacity to support any increase in the number of the journeys by the users of the development. - All development on sites adjacent to Southwark's cycle route network must

<ul style="list-style-type: none"> - Tall buildings: <ul style="list-style-type: none"> - Recommendation that on this site, building heights should be no higher (with one respondent stating 10 stories) than the current as to preserve the character of the area. - Proposed uses: <ul style="list-style-type: none"> - Respondent questions the replacement of a student accommodation by a similar use class (and additional use classes). <p>Infrastructure capacity:</p> <ul style="list-style-type: none"> - Potential water network capacity issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability 	<p>support and integrate into the network.</p> <ul style="list-style-type: none"> - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. An indiscriminate height restriction would fail to optimise the full potential of all development sites (some of which may be suitable for taller buildings). - Active frontages on Blackfriars Road and fronting St Georges Circus are appropriate. The Council would support new homes on the site if there is no longer a need to provide student accommodation at this site. - Noted.
<p><u>NSP20: St George's Health Centre and Tadworth House, Blackfriars Road</u></p> <ul style="list-style-type: none"> - Tall buildings: <ul style="list-style-type: none"> - Redevelopment of this Site Allocation should not include taller buildings. - Suggestions for general amendments of Site Allocation vision/text: <ul style="list-style-type: none"> - The description should be amended to make mention of the tenure of Tadworth House being all social housing as well as acknowledge the nursery on site. - Respondent has expressed that ground floor active frontages would be welcomed and would not interfere with the residences. <p>Traffic / connectivity:</p> <ul style="list-style-type: none"> - Traffic mitigation measures should be implemented to address traffic Issues. <p>Other comments:</p> <ul style="list-style-type: none"> - One representation has commended the quality of the Tadworth House building as it has undergone various improvements and should not be demolished. - Potential water network capacity issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability 	<ul style="list-style-type: none"> - Proposed Site Allocation has been removed from the PROPOSED SUBMISSION VERSION .

NSP 21: Land Between Paris Gardens, Columbo Street, Blackfriars Road and Stamford Street.

- Suggestions for general amendments of Site Allocation vision/text:
 - The site boundary needs to be amended to exclude the Mad Hatter Public House.
 - The Site Allocation text should take into account the current planning permissions within the site boundary and that it is therefore not appropriate to be included for comprehensive redevelopment.
 - It should be recognised that the Site Allocation is adjacent to the borough boundary and the implications that this may have for heritage sensitive assets within Lambeth.
 - There is a better opportunity for the public open space to be placed adjoining the Christ Church gardens.
 - Several respondents have stated that the policy imposes requirements that are overly prescriptive; this includes the provision of Open spaces as an overly prescriptive minimum which may undermine the delivery of a mixed use scheme which is more desirable as it will support the other key principles of activating the Blackfriars Road frontage.
 - Respondent states that it is not the purpose of a Site Allocation to prescribe policy test for new development proposals and instead such policies should be proposed through Development Management policies in the New Southwark Plan.
- Tall Buildings:
 - Concerns that there is no acceptable height indication on Stamford Street. The height should protect the character of Christ Church gardens.

Other comments:

- Potential water network capacity issues. Recommendation to work together with organization to understand infrastructure requirements of sites. Local upgrades to existing drainage may be required to support the anticipated demand.

- The PROPOSED SUBMISSION VERSION excludes the Mad Hatter from the Site Allocation.
- The Site Allocation notes there is an extant planning permission on part of the site. This site has been included as a whole in the event the extant planning permission is not built out as permitted.
- Site Allocation has been amended to require development proposals to recognise the site's close proximity to the borough boundary and must consider the setting of heritage assets in Lambeth, in addition to any cross-boundary issues and the provisions of policies and Site Allocations within reasonable proximity of the site as set out in the Lambeth Local Plan.
- The amended Site Allocation removes the requirement for new public open space.
- As above.
- The purpose of a Site Allocation is to set out site-specific development guidance.
- Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context.
- Noted.

<p><u>NSP22: 1-5 Paris Garden and 16-19 Hatfields</u></p> <ul style="list-style-type: none"> - Suggestions for general amendments of Site Allocation vision/text: <ul style="list-style-type: none"> - It should be recognised that the Site Allocation is adjacent to the borough boundary and the implications that this may have for heritage sensitive assets within Lambeth. There are further concerns about the impacts on the provision of C1 use class on the significant cluster of hotels in and around the Waterloo region. - One respondent has expressed that any late night venues on Hatfields would be inappropriate. - Several representations have commented that the site description should make a note of the Grade II listed buildings located within the site boundary. Representation has stated that the two buildings are both in good condition and important to the character of the area. - Support for the east-west link through the site. There is an opportunity to connect Christ church and crown environs with Hatfields between the tennis courts and Paris Gardens student accommodation. - Amendments to the text include suggestions to: <ol style="list-style-type: none"> 1. Include could potentially accommodate a range of uses 2. Contribute towards the thriving Of employment 'commercial floorspace for ground floor retain space; 'and/or 3. Employment uses should be up to circa 57,000 sqm (GEA) - 4. Redevelopment should create a new mind use the southern portion of this site 'could potentially be' suitable for new homes. - Tall Buildings: <ul style="list-style-type: none"> - Redevelopment should not include taller buildings (taller than the current buildings) which would interfere with the surrounding conservation area. - Potential water network capacity issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No 	<ul style="list-style-type: none"> - Site Allocation has been amended to require development proposals to recognise the site's close proximity to the borough boundary and must consider the setting of heritage assets in Lambeth, in addition to any cross-boundary issues and the provisions of policies and Site Allocations within reasonable proximity of the site as set out in the Lambeth Local Plan. - Noted. However, any development proposals for 'late night venues' will be assessed against the borough-wide plan policies. - The design and accessibility guidance notes the presence of listed buildings on site which should be enhanced. - Noted. - Noted. The Site Allocation supports a range of uses including new homes. - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. An indiscriminate height restriction would fail to optimise the full potential of all development sites (some of which may be suitable for taller buildings). - Noted

concerns regarding future waste water capability.	
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Camberwell Consultation Summary

Area Vision consultation response summary:	Council's response:
<ul style="list-style-type: none"> - Suggestions for general amendments of Site Allocation text: <ul style="list-style-type: none"> - One respondent has commented that the Area vision should make reference to Burgess Park as a place valued for its outdoor wildlife, open space, play and open-air sports facilities; but is unsuitable for indoor sports facilities. Any new route in the park should be carefully considered especially in proximity of areas intended as a wildlife area. Site Allocations should factor in environmental impacts. - Area Vision text should highlight the need for affordable workspace/small business/enterprises/projects. - Respondent would like to see more specific regeneration aims to improve the local environment. Recommendation to include references supporting sustainability, environmental protection and cultural assets. - Site Allocation text should be amended to include the provision of as many homes "while respecting the local character of the area". - Area Vision should highlight the need for affordable workspace for new businesses/artists. - The reference to the institute of Psychiatry should be replaced by a reference to King's College London. - Suggestions for general amendments of Site Allocation map: <ul style="list-style-type: none"> - The Area Vision map should be revised to include the other Site Allocations nearby but outside the Camberwell Area Vision. - Respondent would like the inclusion of Bolton Crescent within the Area Vision. Many respondents have commented requesting a cross-border initiative with Lambeth to improve the areas adjacent to Borough 	<ul style="list-style-type: none"> - Burgess Park benefits from Metropolitan Open Land designation which restricts the type of development that would be acceptable on the park and influences the nature of development acceptable on sites within the setting of the park. The Council reopened Burgess Park following an £8,000,000 upgrade in 2012. As such there is no need to include Burgess Park within the Area Vision for Camberwell. - The Area Vision seeks to deliver workspaces for smaller enterprises, particularly creative industries. - The Area Vision has been amended to require development to improve the local streetscape and environment including new greening. - PROPOSED SUBMISSION VERSION has been amended to state development should provide as many homes as possible while respecting the local character of the area. - The Area Vision seeks to deliver workspaces for smaller enterprises, particularly creative industries. - The Institute of Psychiatry and Neuroscience is satisfactory. - The Area Vision maps in the PROPOSED SUBMISSION VERSION have been amended to improve clarity. <p>The Council has consulted Lambeth as part of the preparation of the New</p>

<p>boundaries.</p> <p>Traffic / connectivity:</p> <ul style="list-style-type: none"> - Respondents would welcome a more extensive emphasis on the provision of pedestrian and cycle routes as well as exercise areas in Camberwell. Many respondents have commented on the need for a focus on encouraging alternative methods of transportation which includes requiring developments to include shared car hubs and working with TFL to provide cycle racks (and Boris Bikes), especially near shopping frontages. Air quality improvement measures and safer route measures were also mentioned. - Additional Green links have been suggested from Burgess Park to Camberwell Green via Lomond Grove, Camberwell Green to Myatt's Fields Park via Camberwell new Road, and Camberwell Station Road and Knatchbull Road. It has also been suggested to provide a direct pedestrian/cycle link from the new Camberwell rail station to Camberwell Town centre. Recommendation to include a green corridor between Camberwell Green and Myatts Field Park. - Whilst the reopening of Camberwell Station received the vast majority of support within the representations received, some respondents have commented that Denmark Hill Station is in need of an upgrade, some suggesting that the Bakerloo Line should be extended to serve the Maudsley and King's Hospitals. - Text should clarify that pedestrians and cyclists routes marked on the diagram are indicative. <p>Employment concerns:</p> <ul style="list-style-type: none"> - 2 respondents have expressed their concerns that employment references are not specific enough to ensure the retention of industrial/micro-industrial spaces with one respondent proposing a resi/industrial mix. - Heritage/faith buildings: <ul style="list-style-type: none"> - Policy should aim to control the number of heritage buildings being turned into faith buildings. - Respondent has suggested the provision of more housing and places of 	<p>Southwark Plan and will continue to work with Lambeth on cross-boundary issues. Bolton Crescent is within Camberwell but the area vision is a high-level vision for the whole of the area, it doesn't set aspirations for specific streets unless they are of significance to the area.</p> <ul style="list-style-type: none"> - May of these aspirations are supported through borough-wide planning policies. The Area Vision for Camberwell states development should prioritise walking and cycling and improve public transport and the road network. - The borough-wide planning policies require development to enhance strategic networks such as the Green Chain walking route, and support new and existing green links across the borough and sub-regionally. Site Allocations between the Camberwell Station Site Allocation and the town centre are required to provide new access routes to create a new route to the station. - The New Southwark Plan supports the extension of the Bakerloo Line to Camberwell as well as the Old Kent Road. All development must demonstrate that the public transport network has sufficient capacity to support any increase in the number of journeys by the users of the development, taking into account the impact of local existing and permitted development. - The Area Visions maps have been revised for the PROPOSED SUBMISSION VERSION to improve clarity. - The Area Vision supports new workspaces for smaller enterprises. The borough-wide policy Small and independent business requires the retention or re-provision of small business space. Where this is not possible development must provide a relocation strategy. - The borough-wide policy Community uses supports new community facilities where provision is made for the facility to be used by all members of the
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<p>worship.</p> <p>Tall Buildings:</p> <ul style="list-style-type: none"> - Many respondents have commented against the inclusion of tall buildings in Camberwell and are in support height restrictions. - - - - Other: <ul style="list-style-type: none"> - Respondent enquires whether Camberwell New Road can be designated as a local Centre. 	<p>community.</p> <ul style="list-style-type: none"> - As above. The Area Vision supports development that provides as many new homes as possible while respecting the local character of the area. - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. An indiscriminate height restriction would fail to optimise the full potential of all development sites (some of which may be suitable for taller buildings). - The PROPOSED SUBMISSION VERSION proposes the stretch of Camberwell new Road between Wyndham New Road and Councillor Street as a Secondary Protected Shopping Frontage.
<p>Site Allocation consultation response summary:</p>	<p>Council response</p>
<p><u>NSP23: Camberwell Station</u></p> <p>Redevelopment of Camberwell Station:</p> <ul style="list-style-type: none"> - The large majority of the comments received have been in support of the reopening of Camberwell station however there was one respondent who expressed concern over the cost of the station being prioritised over other important investments needed in Camberwell. - - Retail/Leisure: <ul style="list-style-type: none"> - One respondent has questioned the provision of retail and leisure uses around the arches as the restoration of other under-used retail units should be a priority as the proposed arches provide successful light industrial uses. 	<ul style="list-style-type: none"> - The NSP does not prioritise the reopening of Camberwell Station over other important investments. The allocation sets out a position that the reopening of the station would be supported in planning terms. - The Site Allocation requires redevelopment to provide at least the amount of B Class employment floorspace as is currently on the site.

NSP24: Burgess Business Park

Capacity:

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| <ul style="list-style-type: none">- One respondent has voiced concern over Burgess Park not being able to sustain the current and anticipated influx of residents and visitors to the area.- Potential water network capacity issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability- Suggestions for general amendments of Site Allocation vision/text:<ul style="list-style-type: none">- Respondent has requested to amend the boundary to exclude the Grade II listed houses on Cottage Green.- Respondent has suggested that the active frontages along the Boundary with Burgess Park are not in line with the Council's aspiration to have an area of wildlife towards the Southern end of the park. Developments should not overshadow the Burgess Wildlife site and particular requirements should be made to prevent the loss of this site due to new developments (artificial lighting, overshadowing ...). Burgess Park is a narrow park which means that any building height has an impact on the Park.- In light of the changing nature of the area, one respondent believes that the provision of industrial uses in the area would not be suitable.- Site Allocation requirement for the providing of 50% of the development floorspace as employment is too prescriptive.- Site Allocation should make reference to the flood risk in the area; all developments should include flood protection management measures. | <ul style="list-style-type: none">- Burgess Park is a Metropolitan Park of strategic significance. The Council has not identified the park as being at capacity or at risk of being at capacity.- Noted.- The SPV amends the site boundary to exclude the Grade II listed residential buildings on Cottage Green.- The PROPOSED SUBMISSION VERSION amends the site vision to remove the requirement for active commercial frontages along the boundary with Burgess Park.- The site is currently a designated Strategic Industrial Location. It is important redevelopment does not reduce employment floorspace across the site due to the strategic function the employment floorspace fulfills.- We are changing our approach to certain areas of industrial land to accommodate new mixed use neighbourhoods to provide new homes, jobs and community facilities for our residents. We require redevelopment of industrial land to include innovative new approaches for mixing industrial uses with new homes to help make the most effective use of sites and respond to market demands. By increasing the levels of employment floorspace, accommodating existing businesses where possible and providing new jobs this will ensure new mixed use neighbourhoods are successful for securing the variety of types of employment space the borough needs. Under current policy redevelopment would require 100% of any redevelopment to be employment floorspace.- Flood risks are dealt with in the borough-wide policy. |
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<ul style="list-style-type: none"> - - Tall Buildings: <ul style="list-style-type: none"> - Several respondents have objected to taller buildings being delivered within this Site Allocation and especially along Wells Way due to issues of: parking, overshadowing/access to sunlight, issues with wind, lack of infrastructure to support this level of development, social problems, logistical issues, and safety. - One representation has suggested the Site Allocation could support a higher density of dwellings than the current proposal. Other respondents have argued that 498 dwellings would be excessive and would be unreasonable should it not be met with the appropriate infrastructure demands. - - Traffic/ Connectivity: <ul style="list-style-type: none"> - An east-west cycle route linking through Wells Way should be implemented. - Recommendation that the parking should not exceed the 10% needed for disabled and electric charging sites. - Traffic mitigation measures should be implemented to address traffic issues and any development provided should be car-free. - - Employment provision: <ul style="list-style-type: none"> - As this site is not situated in a town centre, there should not be any requirement for town centre uses. - - Respondent concerned over large amounts of B1 space being proposed. Respondent believes this will result in a loss of other B class uses and has asked to clarify whether both B1 and C3 uses are being proposed. - - One respondent questions the provision of commercial floorspace for business, creative and cultural employment as there has been no evidence of demand for this within the Site Allocation. 	<ul style="list-style-type: none"> - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. An indiscriminate height restriction would fail to optimise the full potential of all development sites (some of which may be suitable for taller buildings). - The PROPOSED SUBMISSION VERSION removes indicative development capacities. It is accepted the optimum development capacity will be determined through detailed assessment forming part of an application. - The Site Allocation requires enhanced permeability through the site including new east-west green links. - Relevant parking standards are set out in the borough-wide Car parking policy. - As above. Highways impacts will be assessed and mitigated in accordance with the borough-wide policy. - The PROPOSED SUBMISSION VERSION Site Allocation requires B Class town centre uses as the site is currently designated a Strategic Industrial Location. A Classes may be acceptable in appropriate locations. - The PROPOSED SUBMISSION VERSION Site Allocation seeks an uplift in employment floorspace (B1) and also allows industrial employment space (B2, B8). Redevelopment should retain or reprovide workspace for small and independent businesses. Where this is not possible applicants must provide a business relocation policy. - The PROPOSED SUBMISSION VERSION Site Allocation does not require space specifically for creative and cultural industries. However, these uses would be supported as they are supported in the Camberwell Area Vision.
<p><u>NSP25: Butterfly Walk and Morrison's Car Park</u></p>	

<ul style="list-style-type: none"> - - Loss of car parking: <ul style="list-style-type: none"> - Many respondents have expressed concern over the loss of the car park as parking is already an issue within Camberwell and the Morrison's Car Park is recognised as an important car park. It was suggested that the car park is moved underground so there can be more space for active frontages and amenities. - Tall buildings: <ul style="list-style-type: none"> - Concerns have also been expressed regarding tall buildings, especially from residents with gardens on Daneville Road who have particular concerns over light and privacy. - The proposal for 338 as well as the same amount of employment levels were seen within the site boundary was questioned by several respondents. One respondent however proposes that the amount of residential floor space should be flexible as they consider that the site could accommodate a higher number of dwellings. - It was proposed to include a music venue within the 'other acceptable uses'. - All proposals should be assessed against their impacts on the Camberwell Grove Conservation area, in particular the listed Georgian houses. - - Suggested amendments to Site Allocations text or map: <ul style="list-style-type: none"> - 2 respondents welcome the Site Allocation. - The Site Allocation development description should be amended to mention the Colonnades. - The open space should be located adjacent to Daneville Road and make use of the mature trees on the boundary of the site. - One respondent has requested that any development provides a supermarket for 'Working class' families as it is more desirable by local residents. - Respondents have requested that any redevelopment includes worker 	<ul style="list-style-type: none"> - The Site Allocation requires re-provision of the supermarket use. Any redevelopment proposal would be assessed on its merits and the Council would consider any case made for retention or re-provision of the car park on the merits of the proposal. However, the car park is not a preferred use for redevelopment. The Site Allocation has been amended for the PROPOSED SUBMISSION VERSION to support meanwhile uses on the car park. - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. The Site Allocation states that the south and east areas of the site should be lower rise. - The PROPOSED SUBMISSION VERSION removes indicative development capacities. It is accepted the optimum development capacity will be determined through detailed assessment forming part of an application. - D1 Use classes, which may include music venues, are an acceptable land use. Music venues are not a planning use. - The PROPOSED SUBMISSION VERSION Site Allocation notes the site is within the setting of Listed Buildings and Camberwell Grove conservation area. - Noted - The Colonnades is within Camberwell Green conservation area. This will be taken into account. - The PROPOSED SUBMISSION VERSION removes the requirement to provide new open space. However, redevelopment must provide public realm enhancements. - This is not a planning matter. However, the Site Allocation requires retention of the supermarket use.
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<p>accommodation provision.</p> <ul style="list-style-type: none"> - Significant residential development should be located on the Denmark Hill frontage of the site. - The Vision for this site should be health and residents-focused as opposed to business activity-focused. - - Transport/ connectivity issues: <ul style="list-style-type: none"> - There have been a few comments opposed to the East-West route through Jephson Street as it would be disruptive to residents. Concern was raised over the security of the residential properties along Jephson Street. - There have been issues raised concerning the proposed connectivity with respondents arguing that the current proposals are not strong enough. One respondent has suggested that a north-south route be provided through the site to Denmark Hill and Orpheus St and from Danville to Camberwell Church St. One respondent has suggested the inclusion of the Camberwell Police station as this would provide additional access to the northern portion of NSP25. - Several respondents have requested that Daneville Road should remain closed to motor vehicles. <p>Other</p> <ul style="list-style-type: none"> - Potential water network capacity issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability. 	<ul style="list-style-type: none"> - All development will be required to provide new affordable housing as per the borough-wide affordable housing policies. - The Denmark Hill frontage is a protected shopping frontage. As such the frontage will only be suitable for uses acceptable in a protected shopping frontage. - The site is within Camberwell District Town Centre. As such it is a suitable location for a mix of uses including employment uses and new homes. - The aspiration for a new link through Jephson Street has been removed in the PROPOSED SUBMISSION VERSION . - The PROPOSED SUBMISSION VERSION Site Allocation requires access links through the site. The Police Station is within the protected shopping frontage and the frontage should be retained. - Daneville Road is not within the Site Allocation. Temporary and permanent stopping up of roads is not a planning policy matter. - Noted.
<p><u>NSP26: Valmar Trading Estate</u></p> <p>Suggestions for general amendments of Site Allocation text/map:</p> <ul style="list-style-type: none"> - One respondent commented the Site Allocation could support higher density of dwellings/retail/business due to its location in the centre of Camberwell. - Respondent has suggested extending the site boundary to include Milkwell yard to provide additional connectivity for pedestrians and cyclists. 	<ul style="list-style-type: none"> - The PROPOSED SUBMISSION VERSION removes indicative development capacities. It is accepted the optimum development capacity will be determined through detailed assessment forming part of an application. - The PROPOSED SUBMISSION VERSION amends the Site Allocation to require access through the site from Milkwell Yard.

<ul style="list-style-type: none"> - Recommendation to include student/medical staff housing within the Site Allocation uses. <p>Other:</p> <ul style="list-style-type: none"> - No capacity or wastewater infrastructure capacity concerns. 	<ul style="list-style-type: none"> - The Site Allocation would not preclude student housing or housing for medical staff. - Noted.
<p><u>NSP27: Camberwell Bus Garage</u></p> <ul style="list-style-type: none"> - Building retention: <ul style="list-style-type: none"> - Two respondents have argued that the bus garage and the sorting office buildings should be retained due to their contribution to the character of the area and are identified as a heritage asset. - The current users of the sorting office have confirmed that the sorting office will not be available for redevelopment within the plan period. - Given the nature of the activities of Royal Mail, particular attention should be given to what use class is listed as a required use to ensure that the current operations can effectively continue. - Transport and connectivity: <ul style="list-style-type: none"> - Respondents have suggested that higher permeability should be aimed to be achieved between Camberwell Station Road and Warner Road. It was proposed that the new public open space should be placed to link Camberwell Station Road to Warner Road instead of just a green link. - One respondent has argued the Site Allocation should not promote the retention of the bus garage as it will cause additional traffic pressure on the busy Camberwell New Road. - As the site lies in proximity to the Camberwell Trading Estate, any potential impacts relating to changes to the bus stations should be acknowledged and mitigated. <p>Other:</p> <ul style="list-style-type: none"> - Potential water network capacity issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability 	<ul style="list-style-type: none"> - PROPOSED SUBMISSION VERSION Site Allocation has been amended to state the brick bus garage building should be retained where possible. - The Post Office sorting office has been removed from the Site Allocation boundary. - As above. - The Site Allocation sets out that a new access route linking Camberwell Station Road to Warner Road is required. Site Allocation amended to require a new public square in front of the Camberwell Station entrance. - Retention of a bus garage is required if it required for operational reasons. As the bus garage is currently in use its retention will not result in additional pressure on the local transport network - Noted. Redevelopment proposals would consider impacts on surrounding area against borough-wide policies to identify and, where necessary, mitigate impacts. - Noted.

<p><u>NSP28: Abellio Bus Garage, Camberwell</u></p> <ul style="list-style-type: none"> - Conservation areas and listed buildings: <ul style="list-style-type: none"> - This Site Allocation appears to be located in a conservation area and therefore development should not be allowed. - One representation suggests that the cathedral should be listed. - Suggestions for general amendments of Site Allocation vision/text: <ul style="list-style-type: none"> - Responded has asked that the arches be redeveloped and active frontages included to connect Camberwell New Road and Medlar Street. - The indicative placement of the open/green space should be revised to include Medlar Street which at the moment feels unsafe and underused. <p>Other comments:</p> <ul style="list-style-type: none"> - Potential water network capacity issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability 	<ul style="list-style-type: none"> - The site is partially within Camberwell Village conservation areas. Conservation areas do not prevent development. However, any redevelopment proposal will need to consider the borough-wide policy regarding development within and in the vicinity of conservation areas. - Noted. Southwark Council is not responsible for listing buildings. This is the role of Historic England. - The railway arches adjacent to the site are on the Low Line walking route. Any redevelopment of the arches will be assessed against the railway arches policy and the Low Line walking route policy. The Site Allocation requires the site to contribute towards the Low Line walking route. - The SPV Site Allocation removes the requirement for new public open space. - Noted
<p><u>NSP29: Land Between Camberwell Station Road and Warner Road</u></p> <ul style="list-style-type: none"> - Suggestions for general amendments of Site Allocation vision/text: <ul style="list-style-type: none"> - One responded has noted that there is no suggested connectivity route between Camberwell Station Road and Warner road and suggests that this is amended to provide easier access for pedestrians to the station. - No water infrastructure or wastewater infrastructure concerns. 	<ul style="list-style-type: none"> - Noted. However, the Site Allocation on Camberwell Bus Garage (to the north) is a more suitable location for a link between Camberwell Station Road and Warner Road as it aligns with Camberwell Station. - Noted.
<p><u>NSP30: Iceland, 118 -132 Camberwell Road</u></p> <ul style="list-style-type: none"> - Suggestions for general amendments of Site Allocation text/map: <ul style="list-style-type: none"> - Recommendation the allocation includes some green infrastructure to provide a wildlife corridor to the Low Line. To further support the Low Line, one representation has asked that where possible, active frontages should be placed facing the railway. 	<ul style="list-style-type: none"> - The Site Allocation does not include a requirement to contribute towards the Low Line walking route because the west of the railway viaduct is a more feasible alignment. All development proposals will be assessed against borough-wide green infrastructure policies.

<ul style="list-style-type: none"> - Error in the quantum of retail state, respondent has commented that the Iceland and Warren Evans unit to the rear amounts to 1,200 sqm with four residential (C3) Units on the first floor. - One respondent has requested that the Site Allocation should include a requirement for the provision of a mosque. - Traffic/ Connectivity: <ul style="list-style-type: none"> - Traffic mitigation measures should be incorporated including traffic calming measure on Bethwin Road. - Development height: <ul style="list-style-type: none"> - Due to its location in the Camberwell Action Area, one respondent has argued that the site has potential to achieve additional building height. <p>Other comments:</p> <ul style="list-style-type: none"> - No future water infrastructure or wastewater infrastructure concerns. 	<ul style="list-style-type: none"> - Noted. The PROPOSED SUBMISSION VERSION has been updated to reflect the residential use on the upper floor. - The Site Allocation allows for the provision of D use class community space. Applications for a mosque would be in conformity with the planning policy. - Development proposals will be assessed against borough-wide transport policies. Mitigation will be required if necessary. - The PROPOSED SUBMISSION VERSION does not progress a Camberwell Action Area. Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. - Noted
<p><u>NSP31: Wesson Mead, Camberwell Road</u></p> <p>Development impacts:</p> <ul style="list-style-type: none"> - The development of this site is welcomed, although it was pointed out that it should not be to the detriment to residents and local businesses. - Traffic/ Connectivity: <ul style="list-style-type: none"> - Connection from the site to The Low line was encouraged. - Traffic mitigation measures should be incorporated and include traffic calming measure on Wyndham Road. <p>Other comments:</p> <ul style="list-style-type: none"> - Potential water network capacity issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability 	<p>The proposed Site Allocation has not been included in the PROPOSED SUBMISSION VERSION .</p>
<p><u>NSP32: 49 Lomond Grove</u></p> <ul style="list-style-type: none"> - Suggestions for general amendments of Site Allocation text: <ul style="list-style-type: none"> - Respondent suggests that commercial uses should not be considered given 	<ul style="list-style-type: none"> - The Site Allocation requires the re-provision of employment floorspace and allows

<p>the residential nature of Lomond Grove.</p> <ul style="list-style-type: none"> - Development height: <ul style="list-style-type: none"> - One respondent has requested that development heights must be kept in line with preserving existing views. <p>Other comments:</p> <ul style="list-style-type: none"> - No water infrastructure or wastewater infrastructure concerns. - Traffic issues on Walworth Road have been raised by one respondent who suggests that investment in the transport infrastructure is essential. 	<p>for residential uses on any uplift achieved through redevelopment. Lomond Grove was a mixed use nature in places, such as the Site Allocation.</p> <ul style="list-style-type: none"> - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. - Noted - Development proposals will be assessed against borough-wide transport policies. Mitigation will be required if necessary.
<p><u>NSP33: Camberwell Business Centre, Lomond Grove</u></p> <ul style="list-style-type: none"> - Suggestions for general amendments of Site Allocation vision/text: <ul style="list-style-type: none"> - The image shown on P120 should be changed to correspond to the site boundary. - One respondent has asked to amend the site name as 'Camberwell Business Centre' is the name of their business. - Recommendation to amend the site boundary to exclude the hard-standing area as it is under a different ownership. - Respondent has asked that the future planning applications/ development do not prejudice the operations of the existing buildings which include access to the current car park. - Respondent wishes to ensure the potential allocation of the 'Bizspace' adjacent to the Site Allocation for housing redevelopment. - Other comments: <ul style="list-style-type: none"> - No water infrastructure or wastewater infrastructure concerns. - 	<ul style="list-style-type: none"> - Site photo has been updated for the PROPOSED SUBMISSION VERSION . - Site name has been update in the PROPOSED SUBMISSION VERSION as requested. - Site Allocations do not necessarily reflect land ownership. It is the Council's view that optimal redevelopment of the site could be achieved by bringing together the land within the read line boundary. - Impacts of redevelopment on surrounding uses will be assessed against borough-wide planning policies. - Noted. - Noted.
<p><u>NSP34: 123 Grove Park</u></p> <ul style="list-style-type: none"> - Suggestions for general amendments of Site Allocation vision/text: 	

<ul style="list-style-type: none"> - The existing SPD should be referenced within the Site Allocation text. - Traffic / connectivity: <ul style="list-style-type: none"> - There is concern that additional development may contribute to the traffic congestion on Lyndhurst Grove. - Other comments: <ul style="list-style-type: none"> - Respondent would like to see good quality architecture incorporated on the site. - One respondent has requested that the gardens are made public. - No water infrastructure or wastewater infrastructure concerns. 	<ul style="list-style-type: none"> - The New Southwark Plan does not rescind the existing SPD. Any application on the site would need to consider the SPD. - The impact of any redevelopment proposal will be assessed against borough-wide transport policies. - The Site Allocation is within a conservation area. As such any redevelopment would be assessed against borough-wide design policies and conservation area policies. - The Site Allocation does not require new public open space. The site is not within an area of public open space deficiency. - Noted.
<p><u>NSP65: Camberwell Green Magistrates Court</u></p> <p>Suggested amendments to Site Allocation text:</p> <ul style="list-style-type: none"> - One representation agrees with the proposal - Respondent supports this proposal for residential use but considers the 50% employment floorspace inappropriate for this site and suggests the text is amended to provide for a residential development only as the proposed employment requirement will undermine a viable proposal. Additionally, the respondent does not consider that this site is suited for commercial uses as it is not visible from a major arterial route, has limited pedestrian footfall and is not located in close proximity from Camberwell's main commercial area. - Recommendation to include affordable workspace in the list of required/acceptable uses. - Respondent requests further detail of the taller buildings reference and suggests that the design guidance should be more detailed in this regard. - Recommendation to reference the conservation area to ensure consistency with other Site Allocation and to use the conservation area appraisal to 	<ul style="list-style-type: none"> - Noted. - PROPOSED SUBMISSION VERSION Site Allocation has been amended to require a re-provision of employment floorspace, rather than achieve 50% of the completed development if this is greater. The site is within Camberwell District Centre and is unsuitable for an exclusively residential development or a loss of employment floorspace. If a development proposal is unable to meet planning requirements for reasons of viability this would be tested at the application stage. - Camberwell Area Vision seems to provide workspace suitable for small businesses. Applications for such uses would be deemed in conformity with the Area Vision policy. - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. - Noted. Any application would be determined in accordance with borough-wide design and conservation policies.

<p>determine an appropriate approach to enhance the setting of the conservation area.</p> <p>Transport:</p> <ul style="list-style-type: none"> - Suggestion to include a car parking guidance to the policy given this is a key town centre site. - Respondent requests that the pedestrian and cycle routes are improved. Another recommends amending the policy to facilitate the Cycle Hire expansion. 	<ul style="list-style-type: none"> - Any redevelopment proposal would be assessed against borough-wide transport and parking policies. - As above.
<p><u>New Policy: NSP70: Denmark Hill Campus East</u></p> <p>Transport/connectivity:</p> <ul style="list-style-type: none"> - Recommendation to designate a new walking/cycle route through the site to link the station to Hospital Bessemer Road and Windsor walk via the car park to avoid the busy Denmark Hill station. <p>Suggested amendments to Site Allocation text:</p> <ul style="list-style-type: none"> - Respondent supports the Site Allocation and suggests the inclusion of (appropriately designed) taller buildings to support the intensification of the hospitals. - Respondent has commented that this site is also a sensitive location being in a conservation area and containing a number of listed buildings and therefore should be assessed with a relevant conservation area appraisal to determine the form and capacity of new development. This should also include any potential implications for the Grade II Ruskin Park in Lambeth. The recommendation is therefore to amend the design section accordingly. 	<ul style="list-style-type: none"> - Noted. However, the site is not expected to come forward for comprehensive redevelopment. The Site Allocation supports development and intensification within the site that supports the function of the campus. - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. - Noted. The Site Allocation design and accessibility guidance notes the site is within a conservation area and includes several listed buildings.

Crystal Palace and Gipsy Hill Consultation Summary

Area Vision consultation response summary:	Council's response:
<p>General comments:</p> <ul style="list-style-type: none"> - Many representations have commented in support of the new Area Vision, particularly in the proposed MOL designation of Spinney Gardens. 	<ul style="list-style-type: none"> - Noted

<p>General amendments to Area Vision text:</p> <ul style="list-style-type: none"> - Respondent states that the Crystal Palace underpass has not been referenced in the text. - Representation comments that the management of the area (especially towards Crystal Palace borough boundaries meet) seems to be poorly coordinated). - Respondent has commented that the Public realm in Gipsy Hill is “depressing”. <p>Transportation/connectivity:</p> <ul style="list-style-type: none"> - One representation states that because of the Victorian infrastructure, there is a lack of permeability from the area into Crystal Palace Park. - Respondent welcomes the walking and cycling routes and recommends using signposted cycle routes, 	<ul style="list-style-type: none"> - The PROPOSED SUBMISSION VERSION references the underpass. - The PROPOSED SUBMISSION VERSION states that development in this area should be mindful of cross-boundary issues. - Noted. - The PROPOSED SUBMISSION VERSION is supportive of enhancements to enhance permeability in the area. - Noted.
<p>Site Allocation consultation summary</p>	<p>Council response</p>
<p><u>NSP36: Guys and St Thomas Trust rehabilitation Centre</u></p> <ul style="list-style-type: none"> - Suggestions for general amendments to the area vision/text: - Recommendation to extend the site uses of NSP36 to include retail to the ground floor and extend the town centre to provide active frontages and more compatible uses for its location. - Concerns that the mature trees on Farquar Road could be damaged or lost as a result of a redevelopment. - Many respondents have argued that the site should remain a rehab centre/medical or health facility and the Site Allocation should be retained and/or enhanced. - Respondent welcomes the inclusion of a museum as a required use. 	<ul style="list-style-type: none"> - The site is not within the town centre and is at a lower grade to the town centre. A class uses are not considered appropriate in this location. - All development proposals will be assessed against borough-wide trees policies. - The Site Allocation requires retention or reprovision of existing use or alternative health facility where there is a need. - There is no identified strategic need for a museum. Applications for museums

<ul style="list-style-type: none"> - Rather than redevelopment of the site, the respondent would like to see the empty retail premises on the Crystal Palace triangle be restored and converted into residential properties. - A respondent has argued that the site adjoins the Crystal Palace Parade and the bus garage and therefore is subjected to higher levels of air pollution and questions the densification of the Site Allocation for residential purposes. - Tall Buildings: <ul style="list-style-type: none"> - Many respondents have commented on restricting building heights as to retain the residential nature of the area. - Any redevelopment must consult residents of Bowley Close and all other nearby residents whose amenities maybe impacted. - Traffic/connectivity: <ul style="list-style-type: none"> - One respondent has mentioned not wanting the bridge on Farquhar Road widened as this could possibly lead to the loss of the cycle path and the mature trees. Increasing the road width would increase traffic and cause parking stress to the area. - Within this Site Allocation, a green and historical trail could be integrated using existing heritage assets and the tree line on site. <p>Other comments:</p> <ul style="list-style-type: none"> - No water infrastructure or wastewater infrastructure concerns. - Respondent is concerned about the impacts of development on the architectural heritage including on potential impacts on the adjoining Crystal Palace subway. - Some respondents have commented on the development capacity of residential developments causing significant pressures to the Farquhar Road area. 	<p>would be assessed against borough-wide planning policies and maybe successful.</p> <ul style="list-style-type: none"> - These are not part of Southwark - Noted. However, the edge of centre location and excellent public transport accessibility mean the site is suitable for densification and residential uses. - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. - All planning applications are consulted on in accordance with the Council's Statement of Community Involvement. - Noted. The Site Allocation does not include an aspiration to achieve this. - Noted. - Noted. - The Site Allocation states that any development should contribute toward enhancing the setting of the subway. - Noted.
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Dulwich Consultation Summary

- Area Vision consultation response summary:	Council response
<ul style="list-style-type: none"> - - Suggestions for general amendments to the area vision/text: - Vision should be strengthened and further emphasis should be made to Dulwich being an area of green space. - Representation has suggested that the Herne Hill Velodrome should be included as it is within the Dulwich area. - The site vision should reference the conservation areas and the many buildings of historical significance. - Area Vision should prioritise the provision of housing for older residents. - More emphasis should be made to support independent shops and to reduce the number of chains in Dulwich Village/ estate agents on Lordship Lane. - Specific policies should be implemented to penalise landlords for empty units and there should be greater diversity of shops and goods. - Greater emphasis on the importance of the Dulwich Hamlet Football Club should be made. - A design guide for the public realm and the shopfronts in Dulwich should be provided. - Respondent suggests amendments to the text to include that Dulwich is a major education centre for primary and secondary school children. - Respondent requests the retention of Public Houses. - Reference should be made to the 19th Century private housing including the large areas of mid 20th Century Housing at Sydenham Hill and Gypsy Hill as well as other social housing estates including: Kingswood, Lordship Lane, Sydenham Hill, Croxted Road, Lytcott Grove, Delawyk Crescent and 	<ul style="list-style-type: none"> - The openness of Dulwich is clearly identified as part of the character of Dulwich in the Area Vision. - The Herne Hill Velodrome is noted in the Area Vision for Herne Hill and North Dulwich. - The Area Vision does so. - Noted. However, the borough-wide policy supports specialist housing for older people across the borough. - This is outside the powers of planning. - This is outside the powers of planning. However, borough-wide policy supports meanwhile uses. - Dulwich Hamlet Football Club is referenced in the Area Vision for East Dulwich. - The Dulwich SPD provides more detailed planning guidance relating to design in Dulwich. - The Area Vision acknowledges the presence of successful schools. - Borough-wide planning policy offers strong protection to pubs. - The Area Vision references the diversity in housing types in Dulwich.

<p>the 'Dutch' Estates on East Dulwich Grove. Reference to the historic landlord, the Dulwich Estate, should be made within the Area Vision.</p> <ul style="list-style-type: none"> - Text should be amended to reflect that the independent retailers in Dulwich village are struggling in the current financial climate. - Recommendation to remove the paragraph 'protect the independent character of shops...' as respondent views that it is a meaningless statement as respondent argues the council has control over the use class but not of the tenure. - Recommendation to amend the text as there is no requirement for additional school places but there is for more GP services. - - Traffic/ connectivity: <ul style="list-style-type: none"> - Cycling and walking should be strongly supported and additional measures to improve air quality should be taken. Further details should be provided to residents on the proposal of cycle routes. Traffic mitigation needs to address the parking demand imposed by schools and school coaches. No further growth of Dulwich private schools should be made as a result of the traffic impacts caused. - 2 respondents have commented that it is not suitable for a cycle network to be planned through Dulwich Park. - Area Vision should support the improvement to local connectivity and enhancements to broadband and mobile coverage. - Cycle network should include Hunts Slip Road. - There should also be a design guide for shopfronts in Dulwich Village and West Dulwich. - Recommendation to add to the Site Allocation text that the area is significantly less well served by public transportation and therefore many residents use cars. <p>Other Comments:</p> <ul style="list-style-type: none"> - Respondent suggests that a proper basement policy should be implemented. 	<ul style="list-style-type: none"> - The Area Vision seeks to protect the character of shops. - The 'independent' has been removed. - PROPOSED SUBMISSION VERSION amended to support new school places in addition to GP provision. - Noted. Planning applications will be assessed against borough-wide transport and parking policies. - Noted. The Planned cycle routes that will be supported as set out in Southwark's Cycle Strategy. - The borough-wide broadband and digital infrastructure policy supports this. The Planned cycle routes that will be supported as set out in Southwark's Cycle Strategy. - Noted - Area Vision has been amended to reflect this. - Applications for basements will be assessed against borough-wide policies.
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Site Allocation consultation response summary:	Council response
<p><u>NSP35: The Grove Tavern, 520 Lordship Lane</u></p> <ul style="list-style-type: none"> - Respondent is concerned over the policy requirement to retain the disused public house. - One respondent questions this Site Allocation requirement for extra care housing because of air pollution concerns at this junction. - No water infrastructure or wastewater infrastructure concerns. 	<ul style="list-style-type: none"> - Retention of the pub is not required where there is no demand for the pub. - Extra care housing is not a required land use. - Noted.
<p><u>New Policy NSP69: Dulwich Telephone Exchange, 512 Lordship Lane</u></p> <p>General comments to the amended policy:</p> <ul style="list-style-type: none"> - Respondent agrees with the proposal; another comments that the policy has positively interpreted the London Plan. - No anticipated water supply capability or wastewater infrastructure capability issues. - Respondent suggests amending the design and accessibility guidance to reference that that Lordship Lane is part of the strategic road network and development must not impact on the traffic flow - Recommendation to include a reference to the Grade II listed Dulwich Park to ensure its conservation/enhancement. <p>Traffic/parking:</p> <ul style="list-style-type: none"> - Recommendation to amend the design and accessibility guidance to reference that Denmark Hill is part of the SRN and therefore should not impact on traffic flow; a car park strategy should be set out particularly that health facilities have different demands and issues in this regard. - Respondent suggests that the development of the site should facilitate the Cycle Hire expansion and any additional demands on bus services. 	<p>The proposed Site Allocation has been removed from the PROPOSED SUBMISSION VERSION</p>

East Dulwich Consultation Summary:

Area Vision consultation response summary:	Council response
<ul style="list-style-type: none"> - Suggestions for general amendments to the area vision/text: <ul style="list-style-type: none"> - Amend the text to read suburban residential instead of medium density residential. Include the provision of extra homes 'but not at the impact of subverting its suburban character'. - Text should seek to protect the amenity of residents as well as maintaining a balance between shops and the night time economy. - Recommendation to remove the reference to the Dulwich Hamlet Football club being an important visitor attraction. - Recommendation to include supermarkets and a cinema as part of the description of the area. - Area Vision should maintain at least 50% of units on shopping parades along Lordship Lane as A1 retail use. - Text should acknowledge the need for an improved/expanded stadium. - The Area Vision should also be amended to ensure the inclusion of references to the OOS and the ground should only be retained if an alternative facility is not forthcoming. - Respondent welcomes the support for Dulwich Hamlet in the East Dulwich Area Vision and suggests strengthening this by referencing the community function the club also has. - Respondent recommends the council acknowledge the need for a new/expanded Stadium. - Traffic/Connectivity: <ul style="list-style-type: none"> - Include a sentence encouraging the prioritisation of walking, cycling, public transport, and car clubs. - Include that the area is well served by buses. - Vision proposes no solutions to resolve the transportation issues 	<ul style="list-style-type: none"> - PROPOSED SUBMISSION VERSION amended to reflect comments. - Borough-wide policies seek to protect the amenity of residents. - Dulwich Hamlet Football Club is an important visitor attraction. - The Area Vision references the diverse economy. - The borough-wide protected shopping frontages policy sets out the proportion of A1 uses required in different town centres. - Area Vision updated to reflect comment. - Comment dealt with in relation to the proposed Site Allocation. - Noted. - As above. - The Area Vision prioritises walking, cycling and public transport over private vehicles. - Area Vision notes the area is served by busses. - The vision does not identify there are transport deficiencies in East Dulwich.

<p>mentioned.</p> <ul style="list-style-type: none"> - Suggestions to include the provision of additional public open space as respondent comments that it is lacking in the area. - Area Vision should support local connectivity and enhancements to broadband/mobile coverage. - Area vision should include the provision of key social amenities. - Area Vision should clearly reference the importance of Dulwich Hamlet Football Club to the area and to the community as well include a vision for the club as well. <p>Tall Buildings:</p> <ul style="list-style-type: none"> - Height limits should be more clearly stated. 	<ul style="list-style-type: none"> - The New Southwark Plan proposes protection to a number of open spaces across the borough. The Area Vision seeks to enhance the usability of Greendale open space. - Borough-wide policies seek to achieve this. - The Area Vision does this. - As above. - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. An indiscriminate height restriction would fail to optimise the full potential of all development sites (some of which may be suitable for taller buildings).
<p>Site Allocation consultation response summary:</p>	<p>Council response</p>
<p><u>NSP37: Kwik Fit and Gibbs and Dandy, Grove Vale</u></p> <ul style="list-style-type: none"> - Traffic/connectivity: <ul style="list-style-type: none"> - One representation received has stated that the improved connectivity route does not serve any purpose and alternative routes around the site are already well functioning. <p>Other comments:</p> <ul style="list-style-type: none"> - No water infrastructure or wastewater infrastructure concerns. 	<ul style="list-style-type: none"> - The aspiration for a route is to improve accessibility to Besant Place. - Noted.
<p><u>NSP38: Dulwich Hamlet Champion Hill Stadium, Dog Kennel Hill</u></p> <p>Suggestions for general amendments to the area vision/text:</p> <ul style="list-style-type: none"> - Many respondents are concerned that the required uses section does not explicitly state the retention of the football ground facilities, without which, 	<ul style="list-style-type: none"> - The PROPOSED SUBMISSION VERSION has been amended to require retention of ancillary facilities.

<p>the redevelopment of a comprehensive stadium is not possible.</p> <ul style="list-style-type: none"> - One respondent has shown concern that the indicative development capacity could not support the redevelopment of a stadium or community facility and that the site boundary marked in red does not match the site area. 7,658 sqm for a football pitch was also considered insufficient. - The Site Allocation text fails to convey the historic legacy of the Football Club and its value to the community. - Some respondents expressed that the classification of this site as suburban as misleading. - One respondent has stated that a Site Allocation/ development on the playing field land would contravene paragraph 74 of the NPPF. - General concerns regarding the integration of residential schemes alongside a football stadium. - Some respondents have stated that the housing proposal must not be to the detriment of the existing local resident community. - One respondent has suggested the extension of the site boundary to include the adjacent Sainsbury's car park. - No water infrastructure or wastewater infrastructure concerns. <p>Suggested amendments to Site Allocation text:</p> <ul style="list-style-type: none"> - Several representations are concerned that the site's context is listed as 'suburban' as some consider that this is misleading given the urban context of the site and its surroundings and would limit the density of any new residential proposals. Two respondents believe that the London Plan's definition of an urban context more appropriately describes Champion Hill and its surroundings and requests that the Site Allocation is amended to accordingly reflect this. - Respondent considers that the methodology paper contravenes the London Plan and recommends that this is amended to reflect the GLA's 	<ul style="list-style-type: none"> - The PROPOSED SUBMISSION VERSION removes indicative development capacities. It is accepted the optimum development capacity will be determined through detailed assessment forming part of an application. - The Area Vision for East Dulwich recognises the importance of the football club to the community. - Suburban is not descriptive of the character of the area. It is a London Plan designation that relates to the Sustainable Residential Quality matrix. - The Site Allocation does not contravene the NPPF as it explicitly requires the retention of the space for its current function in recognition of the quality of the current use. - Noted. There are examples in London of football stadiums integrating residential uses alongside. - Noted. - Sainsburys have indicated they have no plans to redevelop their ancillary car park as it is essential to the business. - Noted - As above. The Council does not intend to amend the designation from Suburban to Urban. - It is unclear which GLA methodology the representation refers to. However, the
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<p>methodology.</p> <ul style="list-style-type: none"> - Whilst the inclusion of the stadium facilities is welcomed, respondent recommends including the existing area of these (1,696 sqm) or that its exclusion is explained.. - Respondent suggests amending the text to include: <ul style="list-style-type: none"> • A football stadium containing a pitch of 7,685 sqm, ancillary club facilities (Class D2) of no less than 1,696 sqm and a capacity of no less than 3,000 spectators (should no alternative facility be provided within 250m of this site) • C3 residential uses • Open space commensurate with the scale of development - Respondent considers that the draft Site Allocation fails to secure the football club; respondent recommends the council amends the Site Allocation to reflect their development proposals for a new stadium, multi-use games area and 155 residential dwellings. - Respondent suggests revising the Site Allocation to reflect the aspirations to deliver sustainable development on this site. - One respondent objects to the policy as drafted as even though the football ground and associated facilities are protected, these are located within the red line boundary. Respondent recommends amending the red line boundary to only surround the area where housing can be delivered to protect the stadium and ancillary facilities. - Recommendation to amend the site vision to ensure that references are made to the retention of the OOS and ground only being retained should an alternative facility not be forthcoming. <p>General comments:</p> <ul style="list-style-type: none"> - Representation suggests that should the Football club be relocated, the facility should be built prior to the redevelopment of this site to ensure that DHCF can continue to operate without interruption; 2 Respondents consider the open space designation of the pitch counterintuitive as it now prevents a future stadium being built in the area. 	<p>background paper which identifies indicative development capacity follows a robust methodology.</p> <ul style="list-style-type: none"> - The amended Site Allocation includes the football club facilities. - Amendment to the Site Allocation reflects the comments. There is no requirement to provide additional open space in excess of the football ground. - Amending the Site Allocation to include adjacent MOL would be contrary to the Council's planning policy regarding development on MOL. - The Site Allocation provides certainty that part of the site is suitable for residential development. This should generate a substantial uplift in land value given part of the site suitable for housing is currently in use as a car park and temporary car wash. - The proposed allocation seeks to protect the football ground and associated facilities. - In the event the footballs grounds and associated facilities are no longer required this would form a material consideration for any application that proposed a scheme that resulted in the loss of the football ground and associated facilities. - Continuity of club operation would be secured through the planning process in the event an application on the Site Allocation affected the operation of the club. The Site Allocation does not prevent new stadiums being built in the area.
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<ul style="list-style-type: none"> - Respondent comments that the design guidance omits any mention of mixed-use development including taller buildings but this has not been noted in the consultation report. <p>Residential figures:</p> <ul style="list-style-type: none"> - Several representations have questioned the residential development potential of 30 units figures as the respondents suggest that this low target fails to optimise the capacity of the site and is not in conformity with the London Plan policy 3.4 and table 3.2. <p>General comments to the amended policy:</p> <ul style="list-style-type: none"> - Respondent does not envisage any future water supply capability or wastewater infrastructure capability issues. - Respondent finds the removal of the tall buildings reference disappointing. 	<p>Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context.</p> <ul style="list-style-type: none"> - The PROPOSED SUBMISSION VERSION removes indicative development capacities. It is accepted the optimum development capacity will be determined through detailed assessment forming part of an application. - Noted. - The design and accessibility guidance notes that taller buildings may be appropriate as part of a comprehensive redevelopment of the site.
<p><u>NSP39: Railway Rise, East Dulwich</u></p> <ul style="list-style-type: none"> - Potential water supply issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability 	<ul style="list-style-type: none"> - Noted.
<p><u>NSP40: Dulwich Community Hospital, East Dulwich Grove</u></p> <ul style="list-style-type: none"> - Suggestions for general amendments to the area vision/text: - Whilst the comments received are generally supportive of the Site Allocation, 2 respondents have concerns that most of the site is of significant architectural value therefore should be retained/preserved in the event of a redevelopment. - Representation has stated that planning permission has already been granted and would be useful to include within description. - The density of the Site Allocation should be described as urban rather than suburban. - Potential water supply issues. Recommendation to work together with 	<ul style="list-style-type: none"> - The Site Allocation notes the buildings of historic interest should be retained where possible. - The Site Allocation reflects the permitted scheme. - The site is located in a 'suburban' area as defined in the London Plan. - Noted.

organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability	
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Elephant and Castle Consultation Summary

Area Vision consultation response summary:	Council response
<ul style="list-style-type: none"> - Suggestions for general amendments to the area vision/text: <ul style="list-style-type: none"> - Respondent has commented that the text should be amended as the support for the Latin America Community as well as "global businesses" seems contradictory. - Amendments to the planned cycle route on page 151 as it currently cuts through Elephant Park. - Area Vision should make more references to the other ethnic groups that are present within Elephant and Castle. - Respondent is concerned that the Area Vision does not contain sufficient references to housing, particularly to the delivery of affordable housing and community facilities while minimising the displacement of local residents. - The Area Vision (map) should show other neighbouring development strategies to show a holistic development plan of the area. - The Area Vision text should highlight the need for affordable housing. - Area vision should provide space for small local enterprises, such as the Artworks Elephant. - Respondent is concerned that none of the sites include the requirement exclusively for housing as there is a need for social housing in the area which should be reflected within the Site Allocation. - Traffic/Transportation issues: <ul style="list-style-type: none"> - More emphasis should be given to pedestrian routes. Cycling and walking should be strongly supported in addition to air improvement measures. 	<ul style="list-style-type: none"> - It is not contradictory. Many parts of central London are multifaceted. - Area Vision maps have been amended for the PROPOSED SUBMISSION VERSION to improve clarity. - Noted. However, this is not considered necessary. - The Area Vision explicitly notes that new homes with a range of different tenures should be provided. - As above. - It does. This is also stated in the borough-wide strategic policy. - It does. - Affordable housing requirements are set out in borough-wide policy. - Walking routes are supported. The Area Vision specifically notes the Low Line.

<ul style="list-style-type: none"> - - Tall Buildings: <ul style="list-style-type: none"> - Respondent requests the reinstating of a 10 storey height restriction for residential and office blocks outside the core business areas. Many representations have objected to the inclusion of high rises. - Green space and pedestrian routes should be prioritised. - Other comments: <ul style="list-style-type: none"> - Respondent has commented that this area would benefit from public art. - Potential water supply issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability 	<ul style="list-style-type: none"> - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. An indiscriminate height restriction would fail to optimise the full potential of all development sites (some of which may be suitable for taller buildings). - As above. - Noted. Southwark supports public art across the borough. - Noted.
Site Allocation consultation response summary:	Council response
<p><u>NSP41: Newington Triangle</u></p> <p>Heritage asset preservation:</p> <ul style="list-style-type: none"> - One representation is concerned that the preservation of heritage assets is not properly addressed by the Site Allocation and some request to identify some of the listed buildings surrounding the Site Allocation. <p>Traffic/connectivity:</p> <ul style="list-style-type: none"> - Some respondents have requested that traffic mitigation issues should be established to support the Southwark Spine Cycle Route. <p>Suggestions for general amendments to the Site Allocation text and/or map:</p> <ul style="list-style-type: none"> - One respondent is concerned about the open space being incorporated into the development proposals. A more integrated approach to open spaces provision across the site would be more welcomed. - One respondent is concerned that the proposed sqm of the health care centre is not justified and that residential uses have not been made a requirement as a mixed use development would be more favourable. 	<ul style="list-style-type: none"> - The design and accessibility guidance notes the site is within the setting of heritage assets. Development proposals should have regard to existing heritage and context. - Development proposals would be assessed against borough-wide transport policies. - The Site Allocation does not obstruct an integrated approach to open space provision. The Site Allocation illustration has removed the indicative location for open space. The appropriate setting of the open space will be determined through the development management process. - The PROPOSED SUBMISSION VERSION removes the requirement for a health facility.

<ul style="list-style-type: none"> - Recommendation to amend the site capacity as respondent feels the current residential indicative development capacity can be increased. - The Site Allocation has a proposed scheme due for submission this year which does not include the provision of a healthcare facility which may impact the feasibility of the scheme. 	<ul style="list-style-type: none"> - The PROPOSED SUBMISSION VERSION removes indicative development capacities. It is accepted the optimum development capacity will be determined through detailed assessment forming part of an application. - As above.
<p><u>NSP42: Bakerloo Line Sidings and 7 St George's Circus</u></p> <ul style="list-style-type: none"> - Suggestions for general amendments to the Site Allocation text and/or map: <ul style="list-style-type: none"> - Respondent is concerned that there has been no mention of the brick building, identified as locally listable in the Elephant and Castle SPD, at the northernmost tip of London Road. - Respondent is concerned that the requirement for open space is too specific and it should be made clear that the public open space consists of both hard/soft landscaping as it is unclear with the green coloured polygon. - Recommendation to amend the site vision text to exclude the retention of employment floor space as the site currently hosts a rail carriage depot and ancillary buildings which could not be retained. - Traffic/Connectivity: <ul style="list-style-type: none"> - Traffic mitigation measures should be incorporated to the potential return of St George's Road to two-way working. <p>Capacity of infrastructure:</p> <ul style="list-style-type: none"> - Potential water supply issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability. 	<ul style="list-style-type: none"> - Site Allocation has been amended to reference the building One London Road. - The PROPOSED SUBMISSION VERSION has removed the requirement to provide open space on the site. - The site boundary does include employment floorspace in the form of A use classes. - Transport impacts will be assessed against borough-wide transport policies and would depend on the detailed design of any development proposal. - Noted
<p><u>NSP43: 63-85 Newington Causeway</u></p> <ul style="list-style-type: none"> - Use classes: <ul style="list-style-type: none"> - Respondent states that the site vision requirement of 50% of the development being employment is too restrictive. 	<ul style="list-style-type: none"> - Noted. The Site Allocation has been amended to set out the need for employment floorspace in this location. Redevelopment proposals will be assessed in

<ul style="list-style-type: none"> - Whilst the support for active frontages and the cultural led regeneration of the site was noted, respondent suggests more flexibility in the use classes. <p>Capacity concerns:</p> <ul style="list-style-type: none"> - Potential water supply issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability 	<p>consideration of the merits of the scheme and any site-specific circumstances.</p> <ul style="list-style-type: none"> - The Site Allocation requires the retention of the theatre use subject to need. - Noted.
<p><u>NSP44: Salvation Army Headquarters, Newington Causeway</u></p> <ul style="list-style-type: none"> - Employment use proposed amendments: <ul style="list-style-type: none"> - One respondent has expressed concern that the provision of additional A1, A2, A3, A4, B1, B2, C1, D1, C2 alongside the retention of the same amount of B1 will lead to a building substantially taller than the current. <p>Capacity concerns:</p> <ul style="list-style-type: none"> - Potential water supply issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability 	<ul style="list-style-type: none"> - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. - Noted.
<p><u>NSP45: Skipton House, Keyworth Hostel and Perry Library</u></p> <p>General comments:</p> <ul style="list-style-type: none"> - One respondent is concerned that development proposals will not deliver enough affordable housing <p>Capacity concerns:</p> <ul style="list-style-type: none"> - Potential water supply issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability 	<ul style="list-style-type: none"> - The Site Allocation reflects an extant planning permission - Noted.
<p><u>NSP46: Elephant and Castle Shopping Centre and London College of Communication</u></p> <p>Affordable housing/homes for local residents:</p> <ul style="list-style-type: none"> - Respondent is concerned that the development proposals will not deliver enough affordable housing; one respondent would like to see more guarantees that there will be more homes for UK residents. 	<ul style="list-style-type: none"> - Any redevelopment proposals will be assessed against borough-wide affordable housing policies. It is outside the scope and power of the New Southwark Plan to provide such guarantees.

<ul style="list-style-type: none"> - Concern that Site Allocation does not mention the re-provision of theatre space which is an integral part of the identity of the area. <p>Transport/connectivity:</p> <ul style="list-style-type: none"> - Respondent would like to see the entrance of the new tube station to be located next to the existing Northern line entrance to minimise walking distance for people using the different train lines. <p>- Suggestions for general amendments to the Site Allocation text and/or map:</p> <ul style="list-style-type: none"> - New residential developments should be subject to "agent of change" provisions so the future operations of the existing nightclubs and live music venues are not jeopardised. - Revision of the figures set in the Site Allocation to 31,553sq.m GIA for London College of Communication, 27,204 sqm GIA for Elephant and Castle Shopping Centre and 10.669 sqm for Hannibal House. - Recommendation to combine the required uses and 'other acceptable uses;' into one column titled acceptable uses. - Recommendation to change 'employment uses' to 'employment generating uses' - Use classes should be preceded by 'included' to clarify that not all listed uses are required. - The opportunity for public space is constrained and it is not clear how the 15% was deducted. Respondent requests removal of quantum for open space and indicative development capacity as these are considered too prescriptive. - Respondent suggests an emphasis on an uplift in employment generation and uses rather than on an overall floorspace percentage. <p>Other:</p> <ul style="list-style-type: none"> - Potential water supply issues. Recommendation to work together with 	<ul style="list-style-type: none"> - The Site Allocation provides for a comprehensive mix of town centre uses. Any application for theatre space or similar would be assessed against borough-wide policies. - Noted. - All development proposals will be assessed against borough-wide amenity and design policies to ensure new uses are not subject to harmful impacts from existing uses. - Site Allocation updated to reflect comment - There is an important difference between acceptable uses and required uses. - The definition of 'employment uses' includes a wide variety of uses. - The Council does not consider the presentation to be confusing. The use classes listed are options. - The requirement for new public space has been removed from the PROPOSED SUBMISSION VERSION . - The PROPOSED SUBMISSION VERSION requires a re-provision of the existing amount of employment floorspace.
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<p>organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability</p> <ul style="list-style-type: none"> - One respondent strongly supports the aspirations to develop the area. However, some representations have expressed concern about the impacts of redevelopment on the small businesses and entrepreneurial character of the area allocation with particular mentions of the local Latin American community. 	<ul style="list-style-type: none"> - Noted - The importance of the area to the Latin American community is noted in the Area Vision. Borough-wide policies seek to protect small and independent businesses affected by redevelopment.
<p><u>NSP47: Chatelaine House, Walworth Road</u></p> <ul style="list-style-type: none"> - No water infrastructure/ wastewater infrastructure concerns. 	<ul style="list-style-type: none"> - Noted.
<p><u>NSP48: London Southbank University Quarter</u></p> <ul style="list-style-type: none"> - Suggestions for general amendments to the Site Allocation text and/or map: <ul style="list-style-type: none"> - Respondent has questioned the Existing uses being listed as N/A - Traffic mitigation issues should be implemented to contribute the Conversion of St George's Road and London Road - Traffic/Connectivity: <ul style="list-style-type: none"> - Respondent has shown concern in regards to the positioning of the pedestrian and cyclist route as it cuts through a recently renovated University building. 	<ul style="list-style-type: none"> - The PROPOSED SUBMISSION VERSION has been updated to list the existing uses as research and education facilities. - Development proposals will be assessed against borough-wide transport policies - Any permeability lines on Site Allocations are indicative of an aspiration to provide enhanced or new access. They do not represent the preferred route.
<p><u>NSP49: 1-5 Westminster Bridge Road</u></p> <ul style="list-style-type: none"> - Respondent has expressed concern that the site description makes no mention of the heritage value of the buildings even though these are marked as locally listable within the Elephant and Castle SPD. <p>Traffic/ Infrastructure:</p> <ul style="list-style-type: none"> - Traffic mitigation measures should be incorporated to contribute to segregated cycle lanes on Waterloo road and/or Westminster Bridge Road - No water/wastewater infrastructure concerns 	<ul style="list-style-type: none"> - The New Southwark Plan does not rescind the Elephant and Castle SPD. Any redevelopment proposal would be assessed against any relevant policy and guidance in the SPD. - Development proposals will be assessed against borough-wide transport policies - Noted.

Herne Hill and North Dulwich Consultation Summary

Area Vision consultation response summary:	Council response
<ul style="list-style-type: none"> - Transport strategy: <ul style="list-style-type: none"> - Area Vision should contain more explicit transport strategies including pedestrian and cyclist safety measures between the estate and Herne Hill Station. One respondent has commented on the lack of cycle routes proposed on the Area Visions map. - Cycling and walking should be strongly supported in addition to air improvement measures. - Many respondents have commented on safety of the passageway under the viaducts as well drainage issues experienced by Herne Hill residents. - Respondent is concerned that a planning-only approach will not be successful if not met by transport, environmental and enforcement approaches. - Suggestions for general amendments to the Site Allocation text and/or map: <ul style="list-style-type: none"> - Respondent comments that the Area Vision should be strengthened by taking account of the unique character of the area. - Diversification of businesses/shops is essential with a particular focus on independent retailers/shops. - Respondent feels that a better cross-boundary approach should be undertaken between the LB Lambeth and LB Southwark. - The Area Vision text needs considerable amendments, especially as the description of Herne Hill as being simply a 'leafy suburb' is inadequate. Particular mentions should be made to the Sunday Market which is one of the most successful aspects of Herne Hill. - Measures should be implemented to redevelop currently vacant properties 	<ul style="list-style-type: none"> - The amended Area Vision explicitly seeks to improve junction improvements to make the town centre safer. - The Area Vision does support cycling and walking. - The area vision seeks to improve pedestrian access under the railway viaduct. - Noted. - The Area Vision attempts to do so. - The Area Vision supports diversification of shops. - The Council works closely with neighbouring boroughs concerning cross-boundary issues. - Area Vision notes the successful Sunday Market.

<p>and businesses within the area.</p> <ul style="list-style-type: none"> - The Area Vision should reference and support the colonies of bats, newts and stag beetles alongside birdlife present in the run of railway arches. - - Tall Buildings: <ul style="list-style-type: none"> - Respondent requests the reinstating of a 10 storey height restriction for residential and office blocks outside the core business areas. Many representations have objected to the inclusion of tall buildings as it would have many negative effects on the residential buildings on Stradella Road. - Respondent has commented that the area is more of a village than a town and any development should take this into considerations. - Other: <ul style="list-style-type: none"> - Respondent asks how will refuse waste be collected from all the new units. 	<ul style="list-style-type: none"> - The Council supports meanwhile uses in vacant premises. - An Area Vision is strategic and high level. Any development that is likely to impact on habitats will be assessed in accordance with relevant borough-wide policies. - The Area Vision does not mention taller buildings. Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. - Noted. - Development proposals will be assessed against borough-wide policies relating to servicing of development.
<p>Site Allocation consultation response summary:</p>	<p>Council response</p>
<p>NSP50: Bath trading estate:</p> <p>Tall buildings:</p> <ul style="list-style-type: none"> - Many respondents have commented that development heights need to be within the same heights of the existing buildings (2 storeys) to preserve the important views and historic landscape which includes the ornate cast iron railway bridge. Residents of Stradella Road have commented that the redevelopment of a multi-storey building would impact the properties and access to light. - Respondent has voiced support for the inclusion of this site as the Bath Trading Estate is recognised as being successful but it is not being used to its full potential and its appearance is not in keeping with the development of the local area. - Respondent is concerned that any development would be detrimental to the Conservation area. - - Employment: <ul style="list-style-type: none"> - Respondents would like to see the protection of existing businesses on the 	<ul style="list-style-type: none"> - The Site Allocation states that development should reflect existing building heights in the area. - Noted. - The site is within the setting of a conservation area and a registered park. Any redevelopment must respond positively to heritage. - The Site Allocation seeks to achieve this aspiration.

<p>Bath Factory Estate as many respondents are concerned that the affordable business space that BFE currently provides will be lost.</p> <p>Recommendation to amend the required uses to state B1(C) uses.</p> <ul style="list-style-type: none"> - Transport strategy: <ul style="list-style-type: none"> - Many respondents have commented that an access on BFE for pedestrian access would be welcomed. However, two respondents have argued that the pedestrianisation of the area to the rear of commerce would be detrimental to the businesses on Norwood Road and would undermine the privacy and security of residents. One respondent has suggested making shop frontages front and back to tackle this issue. - Respondent states that the site vision should acknowledge the Site Allocation being located on the borough boundary and development should preserve and enhance the setting of Brockwell Park. - Whilst many respondents have commented showing support for the Area Vision/Site Allocation, one respondent has voiced concern over parking stress as a result of redevelopment. - Suggestions for general amendments to the Site Allocation text and/or map: <ul style="list-style-type: none"> - Respondent would like to see the inclusion of the estate onto Croxted Road into the Site Allocation as it is in need of regeneration. - Concerns were expressed in regards to the implications of a new town centre to the area; however, other respondents welcomed the idea of improving the shops. - Additional measures to improve air quality should be implemented. 	<ul style="list-style-type: none"> - The amended Site Allocation permits a new link but it is not a requirement of redevelopment. The appropriateness of any proposed route relating to applications will be assessed in light of the merits of the detailed proposal. - Site Allocation has been updated to reflect comment. - Development proposals will be assessed against borough-wide transport and parking policies. - Part of the estate does front Croxtex Road. - Herne Hill is a District Town Centre. This is not a new designation. - Noted. Development proposals will be assessed against borough-wide air quality policies.
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London Bridge Consultation Summary

Area Vision consultation response summary:	Council response
<ul style="list-style-type: none"> - Transport strategy: <ul style="list-style-type: none"> - Strong support should be given to cycling and walking as well as other air 	<ul style="list-style-type: none"> - Strong support is given to walking and cycling in the Area Vision and throughout the

<p>quality improvement measures.</p> <ul style="list-style-type: none"> - Under section 13.1.2, respondent suggests including text to enhance local accessibility and encourage developments to contribute to the Thames Riverfront. - Establish the investment in wider transport interchanges including cycling, river, tube, and buses. - Respondents have commented that Snowfields (and much of the Area Vision) is too narrow to be able to handle an increased traffic flow without significant improvements which include improvement of pavements and the removal of bollards/evening out of the pavement to facilitate pedestrian journeys. - Respondent has requested the clarification on whether motor vehicles will be excluded. - Suggestions for general amendments to the Site Allocation text: - Area Vision text should include a statement regarding the existing Kings College London and Guy's Hospital as centres of academic and health excellence. - Respondents are concerned that more 'shard-like' developments will make the area more unaffordable to local residents and local businesses. - The Northern part of Bermondsey Street lies within both the Bermondsey and the London Bridge Area Vision, assigning the area to two different visions. - The Area Vision does not take into account enough of the heritage-sensitive character of Bermondsey Street. - Area Vision should acknowledge the presence of residential properties adjacent to the Site Allocations. - Greater emphasis should be given to establishing a clear priority for commercial, cultural, medical, and research development, over residential 	<p>plan.</p> <ul style="list-style-type: none"> - Area Vision has been amended to reflect comments. - The Area Vision shares this aspiration. - Any redevelopment proposals will be assessed against borough-wide transport policies. - The Area Vision does not exclude motor vehicles. Stopping up of highways is not a planning matter. - The Area Vision does this. - Noted. All residential development will be assessed against borough-wide affordable housing policies. - Bermondsey Street could be considered part of London Bridge and Bermondsey. The Area Visions do not have hard borders. - The southern part of Bermondsey Street is within a conservation area. Development proposals within and in the setting of conservation areas must take this into account. The Area Vision does reference the historic character of the area. - The Area Vision does acknowledge the area includes a mix of uses including residential areas. - The Area Vision seeks to support a range of land uses. There is no reason to preference residential development above all else as this may harm the mixed
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<p>development (excluding student accommodation).</p> <ul style="list-style-type: none"> - Area Vision should include stronger recognition of London Bridge's role as an important local destination and town centre designation. - Support should be extended to St Thomas Street, high street London Bridge (Tooley St), Thames Esplanade and the Green Grid and not only the Low Line and St Thomas Street high street. <p>Suggestions for general amendments to the Site Allocation map:</p> <ul style="list-style-type: none"> - The Area Vision diagram (and site diagrams generally) mostly include the footprints of: existing buildings which are unlikely to be demolished, projects which are underway, and current planning application approvals. - More public/green space would be welcomed. - Respondent requests higher standards for new development including buildings and open spaces. - Many responses were received in support of The Low Line; one respondent has requested that the text reflect that the Low Line is an economic and cultural enhancement to the public realm. - The Area Vision map should illustrate other aspects of change envisioned for London Bridge to create a more forward-looking Vision. - Area vision(s) should highlight the archaeological importance of the sites. <p>Suggestions for general amendments to the Site Allocation boundary:</p> <ul style="list-style-type: none"> - One respondent has commented that the applicable area of the London Bridge Area Vision needs to be reduced – and many representations have commented that this particular end of Bermondsey St should be excluded; the northern part of Bermondsey Street with parts of Snowfields should be excluded from the Area Vision or alternatively be a separate vision. - Respondent proposes a combined site (a reduced NSP53 and NSP52). 	<p>character of the area. Student accommodation to support the hospital may be considered acceptable.</p> <ul style="list-style-type: none"> - Area Vision has been amended to reflect comments. - Area Vision has been amended to reflect this. - The Area Visions maps have been updated for the Proposed submission version . - The Area Vision shares this aspiration. - Noted. The New Southwark Plan seeks to ensure high standards for new development. - Area Vision has been updated to reflect comments. - As above. - Site Allocations identify any archaeological considerations. - Noted. Area Visions do not have 'hard' boundaries. Many areas do not fall neatly into one Area Vision or another. - Noted. However, the sites will remain separate as they are not linked.
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<ul style="list-style-type: none"> - Tall buildings: <ul style="list-style-type: none"> - One respondent has requested reinstating the 10 storey height restrictions on residential towers outside the core business area and many have responded voicing their objection towards high rises as well as inappropriate scale and proportions of developments as this would be detrimental to the 'village' feel of Bermondsey. - Any change to the scale of the area would be detrimental to the Bermondsey Street conservation area. Explicit references should be made to the preservation of the conservation area. 	<ul style="list-style-type: none"> - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. - Noted.
Site Allocation consultation response summary	Council response
<p>NSP51: London Bridge Health Cluster</p> <ul style="list-style-type: none"> - Suggestions for general amendments to the Site Allocation text and/or map: <ul style="list-style-type: none"> - The Site Description should include a reference to the point closure of Newcomen Street at a point west of Tennis Street. - Site Allocation should include requirements for the range of ancillary uses which support the health, research and education facilities including C3 (residential) uses and B uses. - Recommendation for an alternative text to read "comprehensive mixed-use redevelopment within the site should include taller buildings subject to consideration of impacts on existing character, heritage and detailed townscape analysis". - Respondent has requested for the addition of 'academic' use to 'educational' use under the required uses of the site. - The Site Allocation should include a stronger analysis of the heritage significance. - - Connectivity/ green infrastructure: <ul style="list-style-type: none"> - Promote health and well-being through the implementation of green infrastructure and improved connectivity including an east-west permeability route through the site and linking the inns and yard through 	<ul style="list-style-type: none"> - Noted. However, the purpose of the Site Allocation is not to provide guidance for comprehensive redevelopment. The Site Allocation sets out land uses that will be supported in the area to support the functioning of the London Bridge Health Cluster. - The Site Allocation supports this. - Site Allocation text has been amended to reflect that comprehensive redevelopment is not anticipated. - This is unnecessary. - The level of heritage analysis is consistent across for all Site Allocations. /where heritage is a relevant factor any development proposals would be assessed against borough-wide heritage and conservation policies and respond to the local context. - The design and accessibility guidance notes the wider context of the site. Enhancements to permeability within the Site Allocation would be supported provided it benefited the function of the London Bridge Health Cluster.

New City Court.	
<p><u>NSP52: Land Between Melior Street, St Thomas Street, Weston Street and Fenning Street</u></p> <p>Response to consultation summary: Heritage assets/preserving the character of Bermondsey:</p> <ul style="list-style-type: none"> - Respondent is concerned about the loss of independent shops in the area. One respondent has suggested that chain retailers should be banned. - The fabric and setting St Thomas Street viaduct arches must be preserved. Suggestions to amend the text to read: The site within the setting of the Grade II listed railway arches. - Several respondents have commented that Beckett House should be retained and not demolished. - Suggestions for general amendments to the Site Allocation text : <ul style="list-style-type: none"> - Western Street has been wrongly referenced as Weston Street. - Suggestions for general amendments to the Site Allocation map: <ul style="list-style-type: none"> - The site vision diagram illustrated one approach to site layout and will need to be subject to detailed site analysis. <p>Transport/Connectivity:</p> <ul style="list-style-type: none"> - The Site Allocation for this site and NSP53 would be strengthened by recognising their individual and collective contribution to St Thomas Street and could benefit from a clear planning strategy. <p>Tall buildings:</p> <ul style="list-style-type: none"> - Many respondents have commented against the inclusion of high rises within the Site Allocations to preserve the historical character and the conservation area. Respondent has requested that a height guidance is implemented. Respondents are concerned that a high rise development 	<ul style="list-style-type: none"> - The New Southwark Plan sets out acceptable planning uses. The New Southwark Plan cannot control which operators operate from a business premises. - The Design and Accessibility guidance notes development should retain and enhance the setting of the railway arches. - Noted. However, Beckett House is not listed. The Council cannot prevent this unlisted building from being demolished. The site currently benefits from an extant planning permission. - The Street is named Weston Street. - Noted. The site illustrations have been amended for the Proposed submission version . - Noted. Area Visions seek to provide a coordinated strategic approach to redevelopment of key sites. - Applications for tall buildings will be assessed against borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. Height restrictions would fail to optimise the potential of all development sites (some of which maybe

<p>will cause problems for pedestrians because of overshadowing, wind tunneling, and overcrowding. A petition including 110 signatures of businesses and residents nearby to the Site Allocations objection to tall buildings.</p> <ul style="list-style-type: none"> - Buildings should slope down away from Guys towards Bermondsey Street. - Respondent is concerned about the architectural quality of proposals; single monolithic elevations along St Thomas Street should be discouraged. Respondent is concerned about the impact of intensification on local microclimate. <p>Indicative development capacity:</p> <ul style="list-style-type: none"> - One respondent argued the requirement for at least 50% of the development to be for employment is overly prescriptive and fails to acknowledge that each site within the Opportunity area/ Regeneration area has its own set of circumstances. One respondent has however commented that a minimum 50% commercial rule for both sites is essential. - Saved Policy 1.4 if the UDP 2007 and DM24 should be used to assess appropriate floorspace proportions. - Most respondents are supportive of the Site Allocations of the approach to provide mixed-use development within the site. <p>Capacity/ infrastructure:</p> <ul style="list-style-type: none"> - Potential water supply issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability - Proposals should encourage and support Sustainable Urban Drainage systems. 	<p>suitable for taller buildings).</p> <ul style="list-style-type: none"> - Noted. The Design and Accessibility guidance states that taller buildings should be towards the west of the site. - Noted. Any redevelopment would be assessed against the New Southwark Plan design policies. - The site is located in the CAZ and highly accessible due to proximity to London Bridge Station. - The New Southwark Plan is the Council's plan to replace the UDP saved policies. - Noted. - Noted. - Noted.
<p><u>NSP53: Land between St Thomas Street, Fenning Street, Melior Place, Snowsfields and Bermondsey Street.</u></p>	

<p>Response to consultation summary: Heritage assets/preserving the character of Bermondsey:</p> <ul style="list-style-type: none"> - Respondent is concerned about the loss of independent shops in the area. One respondent has suggested that chain retailers should be banned. - Representation has requested the retention of the Leather Warehouse and other undesignated buildings as many respondents are concerned about the impact of development on local heritage assets including the Grade II listed Railway Arches, Leather Warehouse, Horseshoe Inn and Bermondsey St Conservation area. - The fabric and setting St Thomas Street viaduct arches and the Horseshoe Pub on Melior Street must both be preserved. Suggestions to amend the text to read: The site within the setting of the Grade II listed railway arches. - Suggestions for general amendments to the Site Allocation text : <ul style="list-style-type: none"> - Respondent has requested the explicit statement of the 35%/40% site occupancy and 14 storey assumptions as guidance for development.(53) - The Site Allocation text omits the current occupancy of the two 4 storey buildings owed by Sellar.(53) - Policy should encourage dining/drinking establishments with outdoor seating areas on Bermondsey Street. - The employment floorspace on site is 3,343 sqm. - Suggestions for general amendments to the Site Allocation map: <ul style="list-style-type: none"> - Recommendation by several respondents to increase the number of green/public open spaces. - The site vision diagram illustrated one approach to site layout and will need to be subject to detailed site analysis. - There have been requests for the exclusion of 40 and 42/44 Bermondsey Street. Two Recommendations to combine the reduced NSP53 and 52 should merged be into one to form one Site Allocation. 	<ul style="list-style-type: none"> - The New Southwark Plan sets out acceptable planning uses. The New Southwark Plan cannot control which operators operate from a business premises. - The Design and Accessibility guidance notes the warehouse as an important unlisted building within the Bermondsey Street Conservation Area which makes a positive contribution to the area. Development proposals should seek to retain and enhance where possible the townscape setting provided by the warehouse. - The Proposed submission version removes indicative development capacities. It is accepted the optimum development capacity will be determined through detailed assessment forming part of an application. - The Proposed submission version references the temporary use of the building. - Noted. - Noted. - The site allocation requires new public open space. - Noted. The site illustrations have been amended for the Proposed submission version . - Noted. The Proposed submission version removes 40 and 42/44 Bermondsey Street from the Site Allocation. The sites on St Thomas Street have not been merged as they are not linked. - Noted. However, Bermondsey Street has been removed from the site allocation.
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<ul style="list-style-type: none"> - Respondent supports the vision to improve active frontages and suggests the extension of these along Bermondsey Street. - It should be noted that the area designated as potential opportunity for Public Open Space is the yard of the JMB block of flats which currently accommodates pedestrian access into the dwellings, refuse accommodation and a residents' car park. <p>-</p> <p>Transport/Connectivity:</p> <ul style="list-style-type: none"> - More focus should be given to pedestrianised areas and increase permeability throughout the sites, buildings on the historic fabric of alleys, and courtyards. The area's role as a transition area should be acknowledged to increase permeability. A right of way should be provided through the site. <p>Tall buildings:</p> <ul style="list-style-type: none"> - Many respondents have commented against the inclusion of high rises within these two Site Allocations to preserve the historical character and the conservation area. Respondent has requested that a height guidance of 5 storeys is implemented. Respondents are concerned that a high rise development will cause problems for pedestrians because of overshadowing, wind tunneling, and overcrowding. A petition including 110 signatures of businesses and residents nearby to the Site Allocations objection to tall buildings. - Buildings should slope down away from Guys towards Bermondsey Street. - Respondent is concerned about the architectural quality of proposals; single monolithic elevations along St Thomas Street should be discouraged. Respondent is concerned about the impact of intensification on local microclimate. <p>Indicative development capacity:</p> <ul style="list-style-type: none"> - One responded argued the requirement for at least 50% of the development to be for employment is overly prescriptive and fails to acknowledge that each site within the Opportunity area/ Regeneration area has its own set of circumstances. One respondent has however 	<ul style="list-style-type: none"> - Noted. The Proposed Site Allocation does not illustrate potential configurations of open space. - The Site Allocation requires new access through the site. - Noted. Area Visions seek to provide a coordinated strategic approach to redevelopment of key sites. - Applications for tall buildings will be assessed against borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. Height restrictions would fail to optimise the potential of all development sites (some of which may be suitable for taller buildings). - Noted. The Design and Accessibility guidance states that taller buildings should be towards the west of the site. - Noted. Any redevelopment would be assessed against the New Southwark Plan design policies. - The site is located in the CAZ and highly accessible due to proximity to London Bridge Station.
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<p>commented that a minimum 50% commercial rule for both sites is essential.</p> <ul style="list-style-type: none"> - Saved Policy 1.4 if the UDP 2007 and DM24 should be used to assess appropriate floorspace proportions. - Most respondents are supportive of the Site Allocations of the approach to provide mixed-use development within the site. <p>Capacity/ infrastructure:</p> <ul style="list-style-type: none"> - Potential water supply issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability - Proposals should encourage and support Sustainable Urban Drainage systems. 	<ul style="list-style-type: none"> - The New Southwark Plan is the Council's plan to replace the UDP saved policies. - Noted. - Noted. - Noted.
<p><u>NSP54: Colechurch House. London Bridge Walk</u></p> <ul style="list-style-type: none"> - Respondent has suggested that the Site Allocation can be strengthened by acknowledging that the site provides a Gateway Role for people arriving in London. - Site Allocation text should be amended to include references to improvements to the public realm and public space. - The Site Allocation should extend the site boundary to include the footbridge over Duke Street Hill. - Potential water supply issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability - Design and accessibility statement should include reference to active frontages. - Correct the references to Duke Hill Road as Duke Hill Street. 	<ul style="list-style-type: none"> - The Area Vision for London Bridge notes London Bridge is one of London's busiest and fastest growing transport hubs. The site does not fulfil a gateway role over other sites in the vicinity of the station. - The Site Allocation requires redevelopment to provide a high quality pedestrian environment which links to London Bridge and the Thames Path. - Redevelopment may not reprovide a footbridge over Duke Street Hill. - Noted. - The Site Allocation requires active frontages on Duke Street Hill. - Noted and amended.

Nunhead Consultation Summary

Area Vision consultation response summary:	Council's response
<ul style="list-style-type: none"> - - Suggestions for general amendments to the Area Vision text and/or map: <ul style="list-style-type: none"> - Many respondents have commented that the strategy/Vision for Nunhead is not clear or ambitious enough. There are many opportunities to improve shop fronts, improve the cycle paths and further develop the Nunhead area. - - Connectivity: <ul style="list-style-type: none"> - The Visions should include more ambitious cycle/pedestrian routes as these should be strongly supported in addition to air quality improvement measures. - - Tall buildings: <ul style="list-style-type: none"> - Two respondents have requested that the New Southwark Plan should reinstate the height restrictions of 10 storeys outside of the core business area, or at least provide clarity of the word 'taller' as the action plan states precise height restrictions. 	<ul style="list-style-type: none"> - Noted. However, the Area Vision seeks to enhance the Local Centre. The Peckham and Nunhead Area Action Plan includes a more detailed vision for Nunhead and includes Site Allocations. The New Southwark Plan does not replace this. - The Area Vision does this. - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context.

Old Kent Road Consultation Summary

Old Kent Road Area Vision summary:	
<ul style="list-style-type: none"> - - Suggestions for general amendments to the Area Vision text and/or map: <ul style="list-style-type: none"> - Some respondents have commented that the 20,000 homes are out of proportion and will cause significant stress on available services. - Several respondents have commented that the Vision should include as much green space as possible with another proposing the inclusion of trees and lots of soft-soaping strategies. - The text should be amended to note the existing cultural and creative uses in this area including (artists') studios space and flexible workspace. 	<ul style="list-style-type: none"> - Opinion noted. - The Area Vision requires new open space and parks. - Comment noted. The Old Kent Road Area Action Plan will provide a detailed Area Vision.

<ul style="list-style-type: none"> - Recommendations to amend the Area Vision to make reference to Burgess Park as a park valued for its wildlife, open space, recreation and sports facilities; it should be clear that the indoor built sports facilities and tall buildings around the park would be unsuitable. - Area Vision should encourage more active frontages with homes set back from roads and late night activities. - The Area Vision needs to prioritise affordable/social housing as well as social infrastructure such as schools and medical centres. Many representations have commented against the displacement of local residents - Recommendation to make Public art a requirement, possibly forming a new public art trail from central London to New Cross. - Respondent has proposed the amendment of the text to say "the proposed town centre" instead of "town centre". - Light industrial units should be provided as it is an integral part of the OKR character. - Connectivity: <ul style="list-style-type: none"> - The Old Kent Road area would be improved by dedicating space to a segregated cycle lane. Cycle routes received many responses as respondents believe that additional cycle lanes should be considered especially around proposed new station entrances. - Respondents have suggested the relocation of the Tesco/Albany Road station or propose a third station at Bricklayers Arms and even at the junction of Ilderton Road as it is considered that an increase of 20,000 homes should be met with more extensive transportation measures. - One respondent has reiterated their support for the Old Kent Road Station Two option at the Toys R Us. One respondent has however, commented against the BLE extension and suggests the replacement with light rail or a more cost effective extension. - Tall Buildings: <ul style="list-style-type: none"> - Many respondents have opposed the Old Kent Road Area Visions that 	<ul style="list-style-type: none"> - Burgess Park is a Site of Importance for Nature Conservation and Metropolitan Open Land. Borough-wide policies for these designations set out the type of development that would be appropriate. - Comment noted. The Old Kent Road Area Action Plan will provide a detailed Area Vision. - Comments noted. The Area Vision shares these aspirations. - Comment noted. The Old Kent Road Area Action Plan will provide a detailed Area Vision. - Noted. However, the Proposed submission version is written as though it is adopted. - Noted. The Area Vision shares this aspiration. - The Area Vision promotes improved cycle infrastructure. - Comment noted. The New Southwark Plan supports an extension of the Bakerloo Line down Old Kent Road. - Comment noted. The New Southwark Plan supports an extension of the Bakerloo Line down Old Kent Road. - Applications for tall buildings will be assessed against the borough-wide policy.
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allow for tall buildings with no height restrictions. One respondent has stated that high/taller buildings would negatively impact Pages Walk and the conservation area. Several respondents have also commented that the Old Kent Road Area Visions should not allow for tall buildings and the Area Vision text should be subsequently revised.	This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. An indiscriminate height restriction would fail to optimise the full potential of all development sites (some of which may be suitable for taller buildings).
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Peckham Consultation summary

Area Vision consultation response summary:	Council response
<ul style="list-style-type: none"> - Connectivity/ Transport Strategy: <ul style="list-style-type: none"> - The cycle route along Peckham Road should be rethought as the road is too narrow to accommodate both cycle and motor traffic safely. - Cycling and walking should be encouraged in addition to air improvement measures. Representation has requested a more detailed and strategic focus on the transportation issues in Peckham, particularly from Queens Road into London Bridge and Canada Water, before any substantial development. Access for business deliveries should be taken into consideration. One respondent has however commented that too much emphasis has been given to permeability as it will negatively affect small businesses, social projects, and architecture. - Traffic calming measures should be implemented to encourage alternative modes of transport and reduce pollution. - Respondent expresses concern as to the loss of two different car parks, within close proximity of each other, will place heavy congestion problems associated with construction and the development of a new school. Adequate car parking is essential for the town centre's viability as well as the regular users of the Anglican Church/mosque which uses these car parks several times a week. Concern has also been expressed that the lack of parking provision will affect visitor numbers to Peckham. - Draft site vision replicates a simple north-south and east-west routes but is not supported by any evidence suggesting that this has been guided by a 	<ul style="list-style-type: none"> - Noted. The Area Vision seeks to prioritise cycling and walking and enhance public transport. - As above. However, the Area Vision is a high level strategic vision it does not identify all specific interventions that may contribute towards achieving the overall objectives. - Both sites referred to have been removed from the PROPOSED SUBMISSION VERSION . - Area Visions maps have been revised for the PROPOSED SUBMISSION VERSION to enhance clarity.

<p>detailed analysis of travel patterns</p> <ul style="list-style-type: none"> - Suggestions for general amendments to the Area Vision text and/or map: <ul style="list-style-type: none"> - The Area Vision text should acknowledge the black African and Caribbean communities and businesses in the area as well as the evolving ethnic mix as a result of new developments such as Wood's Road and Wood Dene. - The need for affordable housing should be made clear in the Area Vision. - The Area Vision should encourage the provision of employment floorspace and affordable workspaces as well as small shop/B use units suitable for local and start up businesses and the benefit of these should be recognised within the Area Vision. - 16.1.3 Wrongly references London Bridge within the text; the order of the diagram and paragraph titles was also pointed out as inconsistent. - The Area Vision text would benefit from several amendments including a more detailed approach to accommodate for the needs of all. Respondent particularly mentions the preservation of the thriving nightlife which is so beneficial to Peckham. Several representations have stated a clearer vision with more detailed (guiding) plans and principles would be welcomed as it is not clear from the Area Vision text what is sought to be done to the area. - The Area Vision does not fully address the importance of certain businesses and industries such as Frank's Café, Bold Tendencies, Peckhamplex, Peckham Levels, and the Car Park. The Vision should work to complement these cultural hubs. One respondent has commented that the Vision should commit to retain the brutalist façade of the multi-storey. Reference to the Copeland Park and the Bussey Building should be added to sections 16.1.1 and 16.1.3 which lists a number of key sites/buildings. - Several respondents have commented against the proposals to change the Queens Road Day Services and question why this is has not been included within the Area Vision. - Recommendation to prioritise the Low Line. 	<ul style="list-style-type: none"> - Noted. However, the Area Vision does reference this. - The need for affordable housing is a borough-wide concern and provision of new affordable housing is a borough-wide priority; as expressed through Strategic Policy 1. - Noted. The Area Vision does share this aspiration. - Area Vision has been amended to remove erroneous reference. - The Peckham and Nunhead Area Action Plan sets out a detailed vision for the future of Peckham. The New Southwark Plan draws from this and is a high level vision. - As above. It would be impractical and serve no benefit to attempt to reference important businesses in Peckham which contributed to the area. - The New Southwark Plan does not propose to change Queens Road Day Services. - Noted. The Area Vision does prioritise the Low Line.
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<ul style="list-style-type: none"> - Existing townscape should be referred to as low to medium-rise in height - Include a reference to late Georgian, Victorian and Edwardian buildings within the conservation area - Some respondents have commented that the Area Vision is too 'vague' and that it be amended to provide for more specific strategies rather than this high-vision approach including how the council plans on re-providing a car park of an equivalent size - Tall Buildings <ul style="list-style-type: none"> - Many respondents have commented objecting to the inclusion of tall buildings and requesting a reinstatement of building heights in Peckham. - Respondent requests that explicit reference should be made to protect the rooftop views - Business/Employment <ul style="list-style-type: none"> - Council should address the mix of shops and businesses on Rye lane as it was identified by a few respondents as being in need of strategies to refurbish the street and promote its up-keep. - Loss of light industrial spaces should be mitigated - More emphasis should be given to support local businesses such as provision of access for deliveries, post offices, discounted business rates, local collaboration between traders and businesses. More market stalls and low rent spaces for independent traders and businesses. - Respondent has requested a 50% allocation for small business spaces within all areas of development. - Respondent comments that there should be a housing density bracket rather than the 'as many homes which is considered too vague. <p>Suggestions for general amendments to the Area Vision map:</p>	<ul style="list-style-type: none"> - Noted. However, the townscape is not uniform across Peckham. There are examples of many scales of development. - The Area Vision notes the area is of heritage value. - It is the nature of a strategic document to be high-level. It sets out broad principles. It is not an implementation plan for specific redevelopment. - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. - The Site Allocation for Aylesham Centre and Peckham Bus Station references the need to protect the view from the roof of the Bussey Building. - The Area Vision shares this aspiration. The borough-wide town centre policy also should contribute towards achieving this objective. - Borough-wide policy seeks to ensure existing businesses affected by redevelopment are supported to continue operations either through retention of suitable space or through relocation. - The Area Vision supports this aspiration. - The Area Vision supports this aspiration. - The Council's aspiration is to optimize the development potential of all sites. As such a density bracket may result in underutilization of land.
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<ul style="list-style-type: none"> - Respondent would find it helpful if the Area Vision map included the PNAAP boundary to provide additional policy context and strengthen the link between the two documents. - Green spaces should be addressed in the Area Vision as a priority especially in high density residential areas but in all new development as well. <p>Other comments:</p> <ul style="list-style-type: none"> - Particular emphasis should be given to high quality architecture with larger units to accommodate families. - Respondent objects to the removal of Peckham Arch - Text should be amended to include the provision of community spaces for both residents and visitors. - Area vision should set a clear rationale as to the choice of sites - Area vision should encourage improvements to waste and recycling management systems to improve the public realm; more enforcement should be taken for residential properties to encourage hygienic waste disposal systems; another respondent has commented that the Area Vision should contain more explicit references to waste disposal facilities - Provision for emergency access should be made as the Car park is used for air-borne paramedics - The Area Vision does not provide enough policy weight to ensure that development does not 'compromise the operation of existing commercial and night time uses. And respondent therefore has expressed that the plan is considered ineffective and could potentially enable conflicts. The vision lacks the weight to fully guide incoming development - A 'vision policy'; should be introduced before discussing specific sites to provide an opportunity to safeguard against potential conflicts between residential and night time economy. - The area's vision focus on housing comes to the detriment of other 	<ul style="list-style-type: none"> - The borough proposals map includes the PNAAP boundary. - Noted. The Area Vision supports this aspiration. - Noted. However, this is a borough-wide concern. - The Area Vision does not propose the removal of Peckham Arch. - The Area Vision supports new community spaces. - This is set out in the Site Allocations Methodology Paper. Note the Peckham and Nunhead Area Action Plan designates several additional sites in the area. - Noted. However these are borough-wide concerns which are addressed uniformly throughout the borough. - The SPV does not reference the Choumert Car Park. - Noted. The Council contends the Area Vision does have weight. However, development proposals will be assessed against borough-wide planning policies in addition to Site Allocations and Area Vision where relevant. - Noted. - The Area Vision is not housing focused and clearly sets out support for a range of
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<p>uses/services.</p> <ul style="list-style-type: none"> - A more transparent system need to be put in place, the NSP should include a section stating how future engagement on the implementation of the plan will be conducted. 	<p>uses.</p> <ul style="list-style-type: none"> - Formal opportunities for engagement are set out in the Council's Statement of Community Involvement.
<p>Site Allocation consultation response summary:</p>	<p>- Council's response.</p>
<p><u>NSP55: Aylesham Centre and Peckham Bus Station</u></p> <p>Important community assets:</p> <ul style="list-style-type: none"> - Several respondents have commented that the retention of the petrol station and at least 50% of the parking space is essential. - One respondent has commented that within a high PTAL rating, it is expected that parking provision be reduced. - Respondents have requested the retention of a supermarket use as a part of the Site Allocation. - Bus Garage: <ul style="list-style-type: none"> - Recommendation to retain the bus garage in the same location. - Respondent states that there are no supporting documents within the NSP to justify the need for the relocation of a bus garage or the re-routing of bus services. - Inconsistencies within the text which sometimes refers to the bus station as 'garage'. Further inconsistencies in the text include using the terms 'bus station' and 'bus depot'. - Suggestion amendments to text: <ul style="list-style-type: none"> - Respondent suggests the inclusion of an open space equivalent to at least 15% of the site area. - Site Allocation should ensure that 50% of the redevelopment is affordable/social. - Site Allocation should require some affordable housing to be provided 	<ul style="list-style-type: none"> - Noted. The Site Allocation does not encourage or preclude replacement car parking associated with commercial uses. - As above. - The Site Allocation requires retention of supermarket. - The bus station could be relocated on the site provided it continues to operate effectively. - The NSP supports the principle of relocation. It should be explored as part of any comprehensive redevelopment within the site. - PROPOSED SUBMISSION VERSION has been amended to consistently use term station. - Requirement to provide new open space has been removed. - Affordable housing requirements are set at the borough-level based on viability. - Noted. Site Allocation has been amended to reflect comments.

<p>through a Community Land Trust.</p> <ul style="list-style-type: none"> - Site Allocation should provide for local businesses; the required uses section should include affordable workspace, and other acceptable uses should include a live music venue. - Site Allocation text should suggest a phased delivery of the site. - Include within the text that a PTAL and Density range of 650- 1,100 should be acceptable. Density matrix should be stated. <p>Suggestions for general amendments to the Area Vision map:</p> <ul style="list-style-type: none"> - Respondent has commented that the Site Allocation needs to be extended to include the former Jones and Higgins building as the restoration of this building should be a requirement. - Support for Bull Yard as a north-south pedestrian route across the site. - A further entrance should be provided from the northern end of McKerrel Road. - East-west pedestrian route should be extended to Clayton Road. - Respondent has commented that the Site Allocation should be retained to the area set out by the PNAAP. - Recommendation to include an open space requirement. - Active frontage provisions on Hanover Park should be removed. Council should ensure the residents (of Hanover Park) are not adversely affected. - Employment provisions: <ul style="list-style-type: none"> - The A1 retail use should be increased to 17,500 to provide an increase expected in the PNAAP. - The Site Allocation should clarify that the redevelopment vision is to complement the wider town centre's offer. 	<ul style="list-style-type: none"> - The Site Allocation provides for flexibility in enabling a range of employment uses. - Noted. However, The New Southwark Plan does not include phasing for Site Allocations. Phasing will be determined through the detailed planning process. - The Council's aspiration is to optimize the development potential of all sites. As such a density bracket may result in underutilization of land. - Noted. Site Allocation has been amended to include the Jones and Higgins Building. The Site Allocation supports enhanced connectivity through the building. - Noted. Site Allocation shared this aspiration. - Noted. Site Allocation shared this aspiration. - Clayton Road is not adjacent to the Site Allocation boundary. - The Site Allocation has been expanded to include the bus station to ensure that any comprehensive redevelopment explores opportunities to enhance the bus station. - See comments above regards open space. - Noted. Active frontages have been removed as suggested. - The amended Site Allocation does not prescribe a floor area that should be provided for retail. - Noted. Site Allocation amended as suggested.
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<ul style="list-style-type: none"> - Amend the text to remove references to small businesses as the site does not have any currently. Respondent has also suggested amending the text to remove the “re-providing of employment floorspace” as there is not considered to be any. - Tall buildings: <ul style="list-style-type: none"> - Design and accessibility guidance should refer to Policy 26 of PNAAP and the supporting urban design assessment that believes that 20 storeys can be justified in this location. - Whilst several are in support of the redevelopment of Peckham, many respondents have commented against the inclusion of tall buildings within this Site Allocation. - Many respondents have commented on buildings heights, requesting that height restrictions be reinstated and impacts on amenities to neighbouring properties be considered. - One respondent has commented that the 400 homes should be increased to 800 to account for the extended site as it is currently under-estimated and does not accord with sustainable density guidance. - Amenities and local infrastructure: <ul style="list-style-type: none"> - The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. - Potential water supply issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability 	<ul style="list-style-type: none"> - Noted. Site Allocation amended as suggested. - Noted. Site Allocation text has been amended to reference the 20 storeys. - The principle of tall buildings is accepted in the Peckham and Nunhead Area Action Plan. - As above. - The PROPOSED SUBMISSION VERSION removes indicative development capacities. It is accepted the optimum development capacity will be determined through detailed assessment forming part of an application. - Noted. - Noted.
<p><u>NSP56: Cinema and multi Storey Car Park</u></p> <p>Tall buildings:</p> <ul style="list-style-type: none"> - Many respondents have objected to the inclusion of tall buildings and the protection of Peckham’s Skyline. - Many respondents have commented that the demolition of the building must not be allowed as it is part of the character of Peckham. Many have also expressed that the demolition should not take place before a definite 	<p>Proposed Site Allocation has not been taken forward into the PROPOSED SUBMISSION VERSION .</p>

plan is established.

- The PeckhamPlex cinema provides a hugely valuable resource to the area as it provides affordable entertainment as well as the "Watch the Baby" scheme. One respondent, amongst several others, has stated that whilst not against the redevelopment, the relocation of the cinema without any operational gaps should be prioritised.
- Respondents have commented that Peckham Levels should be given time to demonstrate whether the scheme is successful or not
- Respondent has commented that there are other areas of brownfield land around Peckham with more pressing needs to redevelop than the car park.
- The income and employment generated is valuable to Peckham.
- If housing is to be re-provided, it should be exclusively social housing.
- Respondent says it is essential to safeguard the night time economy at the BusseyBuilding but also include family friendly venues.

- Suggestion amendments to text/map:
 - Diagram is vague.
 - Respondent comments that other than the re-provision of the existing cinema, no other entertainment uses (including A3, D2 or A4) as this is a predominantly residential area and is contrary to policy 2 of the PNAAP.
 - Public space provision should be reconsidered and respondent suggests that it should be provided against the railway arches.
 - References to the Low Line project should be made.
 - Redevelopment should be focused on providing services for the community.

Traffic/connectivity :

- The loss of 2 car parks in the area (Multi-storey and Choumert Grove Car Park) will cause traffic and parking issues in Peckham.
- The number of dwellings suggested will increase pressure on local services and amenities including the train station.
- The alley between the cinema and the railway should be improved.
- Respondent has suggested that certain arches should be used as through-routes.

Other :

- One representation stated that a 'bottom up' approach to revitalising this site has been successful and should be supported.
- No water/wastewater infrastructure concerns

<p><u>NSP57: Copeland Park Industrial Park</u></p> <p>Heritage and Tall buildings:</p> <ul style="list-style-type: none"> - Respondents have commented against the inclusion of tall buildings within this Site Allocation - tall buildings on this site should not be permitted. - The Victorian Industrial Building on Copeland Road should be preserved and listed in the local list of heritage buildings. - - Impacts on infrastructure and existing uses: <ul style="list-style-type: none"> - There are concerns about the cumulative effects of development on infrastructure. - The plan should make explicit that the area is a provision for the industrial type of small businesses and office type environment. One respondent has voiced concern about the loss of industrial land and B8 space and another requests that employment provisions are maintained. - Suggested amendments to Site Allocation map/text: <ul style="list-style-type: none"> - The provision of the new public open space should not be located at the centre of the Site Allocation. - This site should be renamed to avoid confusion with Copeland Park. Respondents suggest Consort/Blackpool Road Industrial Site. - Respondent suggests amendment to the text as it only makes reference to B1 and B2 uses which is contrary to PNAAP Policy 6(3). - Two respondents have commented that the re-provision of at least 50% of small business space is excessive and not justified by the NSP evidence base. More flexibility is sought out. One respondent has commented that the emphasis on small businesses should be deleted; PNAAP policy 6 requires new business space to accommodate a range of unit sizes. - Respondents are concerned that the existing uses text is not an accurate reflection of the current site as it is also includes A1 and Sui Generis uses. 	<ul style="list-style-type: none"> - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. The design and accessibility guidance notes that taller buildings should be located towards the north of the site. - The Site Allocation shares this aspiration. The New Southwark Plan does not propose a local list. - Noted. - Noted. The Site Allocation requires re-provision of at least the existing amount of employment uses. - The PROPOSED SUBMISSION VERSION Site Allocation removes the requirement for new open space. - Noted. Site Allocation has been renamed. - Noted. Amendment made as suggested. - The PROPOSED SUBMISSION VERSION removes the requirement and allows for re-provision of existing. - Noted.
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<ul style="list-style-type: none"> - Respondent is concerned that the focus on housing has been prioritised over the amenities and infrastructure of existing residents. - The Site Allocation should seek to retain the Victorian industrial building "British Wine Manufactory" as well as The Old Victorian. - New housing provided should be affordable. <p>Transport/connectivity:</p> <ul style="list-style-type: none"> - The design of the site should be amended to enhance connectivity to Peckham Town Centre. - A southeast-west pedestrian route is welcomed. - Respondent states that policy needs to explicitly address the closure of Blackpool Road; respondent has suggested the retention of the east-west link. - PTAL rating incorrect- 6a rating should be added. - Recommendation to include reference to the provision of a bus garage. <p>Other:</p> <ul style="list-style-type: none"> - Any residential development should be subject to agent of change provisions. - Potential water supply issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability 	<ul style="list-style-type: none"> - The Site Allocation does not prioritise housing over amenities and infrastructure. - Noted. The Site Allocation shares this aspiration. - Residential applications will be required to provide affordable housing in accordance with the borough-wide policy. - The Site Allocation seeks to achieve enhanced permeability and access. - Noted. - Amended Site Allocation provides clarity. - PTAL ratings have been removed from the PROPOSED SUBMISSION VERSION . - Site Allocation requires retention or re-provision of the bus garage, subject to need. - Development would need to ensure it is not exposed to harmful amenity impacts from existing uses. - Noted.
<p><u>NSP58: Choumert Grove Car Park</u></p> <p>Transport/connectivity:</p> <ul style="list-style-type: none"> - Many Respondents are concerned about the loss of a car park as it is currently well utilised and by various user groups including worshippers and traders. However, one respondent has expressed concern that the retention of a car park would preclude affordable housing provisions and one other that the retention of the car park is not necessary. - Respondent is concerned about the inclusion of housing as a required use; 	<p>Proposed Site Allocation has not been taken forward into the PROPOSED SUBMISSION VERSION .</p>

<p>another suggests that parking/residential is not a good mix.</p> <ul style="list-style-type: none"> - Traffic mitigation measures should be implemented. - The east-west pedestrian route must be maintained. <p>Other:</p> <ul style="list-style-type: none"> - Respondent has expressed concern that the need for waste disposal will not be met. - Respondent is concerned about the lack of consultation. - Respondent is concerned about the increase in the number of residential units since the PNAAP. - Concerns that development would lead to a loss of light and increase of noise pollution to the residents adjacent to the Site Allocation. - No water/ wastewater infrastructure concerns - Respondent has commented that as the Site Allocation is situated within a conservation area, a new build would go against this by changing the Victorian character of the area. <ul style="list-style-type: none"> - Suggested amendments to Site Allocation map/text: <ul style="list-style-type: none"> - More creativity was requested for this site proposal as it is a critical town-centre site. - The feral cat colony on this Site Allocation should be acknowledged. 	
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Rotherhithe Consultation Summary

Area Vision consultation response summary:	Council's response
<p>Comments on technical/administrative points:</p> <ul style="list-style-type: none"> - Map should be amended to show that the plan for the Green Link from Southwark Park is to go to Russia Docks Woodland cutting through the site identified as New Kings College Campus. Ensure that the Green Link connecting Southwark Park and Russia dock Woodland allows pedestrians to walk through the Quebec Quarters. - Respondent has asked to reopen a historical Water link from Canada Water to Greenland docks. 	<ul style="list-style-type: none"> - Area Vision maps have been amended for the PROPOSED SUBMISSION VERSION . - This is not explicitly supported in the Area Vision. However, the Area Vision would not necessarily preclude this.

<ul style="list-style-type: none"> - Many respondents have commented that the Leisure Centre provides one of the best quality swimming pools and should be retained. - Two respondents feel that the text should be amended to remove reference of the provision of as many homes as possible as there are fears that this will lead to overdevelopment which won't be met by appropriate infrastructure enhancements and will enable inappropriate scales and densities. - Respondent disagrees with references to infill sites as it would invite residential development on any open space whatsoever. - Respondent disagrees with the statement that local shopping needs are met in shopping parades at Albion Street and Lower Road. - CWAAP and Southwark Core Strategy state 35000 sqm of net additional shopping floorspace whilst Area Vision states 35000 sqm of shops and activities. Discrepancy should be clarified. - Area vision text should address the strain on local schools and health services. - Former Civic Square should be retained and site be classified as other open space. More emphasis should be given to open spaces. - The number of homes suggestion is out of keeping with the local area. - Plans do not adequately address the impacts on infrastructure especially transport/health. - Suggested amendments to Site Allocation map/text: <ul style="list-style-type: none"> - Respondent requests the amendment to the text as they consider that Canada Water is not always accessible by buses and the tube. - Respondent has requested that the Area Vision reference the history of the Docklands area. - Specific reference should be made to reference Canada Water as a Major Town Centre. 	<ul style="list-style-type: none"> - The Area Vision does not reference the existing Leisure Centre. - The Council's aspiration is to optimize the development potential of all sites. As such a density bracket may result in underutilization of land. - The Area Vision doesn't reference infill sites. - Noted. - Noted, error corrected for the PROPOSED SUBMISSION VERSION . - The Council seeks to provide new education places and health facilities through Site Allocation. - The Area Vision shares this aspiration. - See comments above regarding optimization of developable land. - This is a high-level strategic document. The Area Vision provides principled support for new infrastructure. - The Area Vision has an aspiration to improve public transport. - The Area Vision does this. - The Local Plan does reference Canada Water as a Major Town Centre.
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<ul style="list-style-type: none"> - Area Vision should make reference to the area being in flood zone 3 and flood risk management is essential. - Request for the re-provision of a police station. - Parking provisions need to be better addressed in the Area Vision. - Area Vision text should include investment in protection of community open spaces and historical assets. - The Area Vision is more applicable to Canada Water and the text should be redrafted to focus on areas outside the CW area. - One respondent has commented that the vision is too cluttered and additional representations that not enough concern has been given to the environment. <p>Connectivity/ Transportation:</p> <ul style="list-style-type: none"> - Address the traffic congestion leading to the Rotherhithe Tunnel/Roundabout as well as Rotherhithe/Central London and on the Rotherhithe Peninsula. - Two representations have commented that the Area Vision should mention more explicitly the river as an asset to the area, especially in order to capitalise on river transport. - Many respondents have commented on the overcrowding issues at Canada Water Station and Surrey Quays Station and are concerned that this will be aggravated as a result of development and questions regarding future capacity. - Recommendation to improved connectivity between Southwark Park and Canada Water Town Centre. - Suggestion to add reference to a bus-led regeneration as well as support for TfL's Healthy Streets agenda. <p>Employment:</p>	<ul style="list-style-type: none"> - Borough-wide planning policies deal with flooding. - The Council is not responsible for policing and has no evidence of need for new police facilities in Rotherhithe. - Development proposals will be assessed against borough-wide transport and parking policies and take into account the circumstances of the area. - The Area Vision is not an implementation plan. It sets out what type of development will be supported. The Area Vision shares these aspirations. - The Area Vision refers to the entire area. - Noted. The Area Vision diagram has been amended for clarity in the PROPOSED SUBMISSION VERSION . - The Area Vision notes this is a priority. - The Area Vision does this. The New Southwark Plan supports a new bridge over the Thames from Rotherhithe to Canada Water. - Noted. Any redevelopment proposal will need to demonstrate it can mitigate impacts on existing transport infrastructure through the application process. - Noted. The Area Vision supports improvements to walking and cycling. - The Area Vision supports improvements to public transport.
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<ul style="list-style-type: none"> - Suggestion to amend the text to encourage a range of business types and sizes rather than only reference small business spaces. However one respondent has commented that in their view 60% could be maintained as employment-generating, small business workshops. - Some respondents have voiced support for height restrictions in Rotherhithe. A few representations have said that 'Large Tower Blocks' are out of keeping with the area whilst others are supportive of the density as prescribed by the draft Site Allocation. 	<ul style="list-style-type: none"> - The Area Vision supports a wide range of new employment generating uses. - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. An indiscriminate height restriction would fail to optimise the full potential of all development sites (some of which may be suitable for taller buildings).
Site Allocation consultation response summary:	Council response
<p><u>NSP59: Rotherhithe Gasometer</u></p> <p>Gasometer retention:</p> <ul style="list-style-type: none"> - One respondent would like the Council to consider the retention of the Gasometer as part of the redevelopment of the site. However one respondent has stated that the suggestion within the Site Allocation text to preserve the Rotherhithe Gas Holder, which is not listed and is unlikely to be in the future, is unnecessary as it will only add to the costs of redevelopment of the site and put pressure on providing a viable regeneration of the Site Allocation. <p>Decommissioning costs:</p> <ul style="list-style-type: none"> - Respondent argues the Site Allocation should allow for the maximum flexibility in uses to ensure that development is viable. Concerns that B uses only would not be appropriate. - Many respondents have commented that the high costs relating to the decommissioning of the Gas Holders should be taken into consideration. - Site Allocation and map should be amended to reflect its location in an urban density zone. - Suggestions for general amendments of Site Allocation vision/text: - Indicative development capacity should be amended to reflect the potential that the site has to maximise development on brownfield land and to allow 	<ul style="list-style-type: none"> - The Site Allocation does not require the retention of the gasometer. However, retention of the gasometer would be considered acceptable. - Noted. However, the site is suitable for residential uses. Alternative uses would be assessed against borough-wide planning policies. - The costs of decommissioning the gasometer are unknown. The council would take the viability of any development proposal into account at the planning application stage. - The Site Allocation is shown on the New Southwark Plan policies map alongside all other planning designations. - The PROPOSED SUBMISSION VERSION removes indicative development capacities. It is accepted the optimum development capacity will be determined

<p>for a viable redevelopment following the decommissioning of the Gas Holder.</p> <ul style="list-style-type: none"> - The requirement for 15% of the site to be used as a public open space is too prescriptive given the many limitations that the site already presents. <p>Other</p> <ul style="list-style-type: none"> - Respondent proposes the inclusion of a hazardous substance policy to deal with key aspects of redevelopment on hazardous installations. - Potential water supply issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability 	<p>through detailed assessment forming part of an application.</p> <ul style="list-style-type: none"> - The requirement for public open space is removed from the Site Allocation. - Hazardous substances are addressed through a borough-wide policy. - Noted.
<p><u>NSP60: St Olav's Business Park, Lower Road</u></p> <ul style="list-style-type: none"> - Suggestions for general amendments of Site Allocation vision/text: - Concerns that 50% employment space re-provision is too prescriptive and would make redevelopment unviable. Respondent wishes that an emphasis is placed on the quality of employment floorspace rather than quantity; this includes flexible unit sizes, provision of efficient buildings. Existing businesses should be integrated within any redevelopment. - No water/wastewater infrastructure concerns 	<ul style="list-style-type: none"> - PROPOSED SUBMISSION VERSION removes the requirement to provide 50% of the final development as commercial space if this is greater than the existing amount. The revised Site Allocation requires re-provision of employment floorspace to existing levels. - Noted.
<p><u>NSP61: Decathlon site, Surrey Quays Shopping Centre and overflow Park</u></p> <p>Open space:</p> <ul style="list-style-type: none"> - Eight respondents have requested the designation as Other Open Space status of the green space bordering the area to the west of NSP61. Many requests also include seeing Ada's Garden retained as a wildlife sanctuary. One respondent has concerns about the loss of biodiversity. - Requests that the Surrey Docks Farm and Lavender Pond and Pumphouse compound be classified as open space. - 15% open space requirement has not been defined specifically. 	<ul style="list-style-type: none"> - Local Nature Reserves are not created through the plan making process. The area to the west of the site is a strip of trees and scrub that does not meet the Council's criteria for open space designation but would receive protection for its biodiversity value under trees and biodiversity policies. - Surrey Docks Farm and Lavender Pond are already designated open space. - Requirement for open space has been removed from the PROPOSED

<p>Respondent requests that clarity should be provided in this respect, including clarity on the evidence behind this figure. Respondent is unclear whether this figure related to communal open space or if private open spaces provision could contribute towards the target.</p> <p>Transport/Connectivity:</p> <ul style="list-style-type: none"> - More robust connectivity strategies have been requested to Albion Street and Lower road. - Suggestions for general amendments of Site Allocation vision/text: <ul style="list-style-type: none"> - Site reference should refer to Canada Water as a new Major Town Centre. - Respondent has commented that no evidence base has been provided for the requirement of 4,000 sqm of D1. - Respondent believes that NSP61 and NSP62 should be considered as one site to achieve a mass required for the proposed new town centre. - Respondent requests that the council reference the community-approved Master Plan. - The Site Allocation should reference the planning permission which is currently being implemented on site. - Site Allocation text should reference the large Printworks HQ site. - Recommendation to develop the St Olav's Court part of the site first as it is in single ownership and would be able to kick start the redevelopment of the remainder of the Site Allocation. <p>Other:</p> <ul style="list-style-type: none"> - Respondent would prefer the retention of the existing Seven Island Leisure Centre. Any new leisure centre should replicate the facilities currently available to expand on those to meet the growing demand. - The South Dock Boat Yard is not referenced on the map. This should remain untouched and a light industrial/residential mix is not favoured. Many representations have commented objecting to the development on 	<p>SUBMISSION VERSION .</p> <ul style="list-style-type: none"> - The Area Vision for Rotherhithe supports improved pedestrian and cycle routes to enhance permeability. - The New Southwark Plan does refer to Canada Water as a Major Town Centre. - The Council will publish its evidence which justifies the need for a D1 space. The Preferred Option contained an error. The requirement is for 2,000 sqm health centre. - Noted. However the PROPOSED SUBMISSION VERSION amends the boundaries to reflect anticipated applications for comprehensive redevelopment. - Planning decisions are made in accordance with the Development Plan. The Development Plan cannot give weight to planning documents which have not been prepared in accordance with the relevant legislation. - Noted. The PROPOSED SUBMISSION VERSION references the extant planning permission. - The Area Vision for Rotherhithe references the printworks. - Noted. However, the NSP does not seek to hold back development from coming forward. - The Seven Islands Leisure Centre is not within the Site Allocation and therefore not considered as part of the Site Allocation. - The South Dock Boat Yard is not within the Site Allocation and therefore not considered as part of the Site Allocation.
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<p>South Dock Boat Yard; even though not proposed as a Site Allocation by the NSP.</p>	
<p><u>NSP62: Site E, Mulberry Business Park, Harmsworth Quays and Surrey Quays Leisure Park.</u></p> <ul style="list-style-type: none"> - Suggestions for general amendments of Site Allocation vision/text: <ul style="list-style-type: none"> - Site Allocation text should be amended as the description of the former Mulberry Business Park is incorrect as it has been cleared for student accommodation and office uses rather than a new university campus. - Site Allocation should include University campus and student housing as uses. - Respondents requests for the re-provision of the existing Tesco Extra (including the petrol station) as a part of the redevelopment of the site. - The Site Allocation should reference the extant permission for the Leisure Park and RM application. - Respondent has suggested encompassing the site at Robert's Close as this forms part of the Canada Water Masterplan site. - NSP61 and NSP62 should be considered as one in order to achieve the mass required for the new town centre proposed. <p>Traffic/ connectivity</p> <ul style="list-style-type: none"> - Respondent requests that a dedicated (free) car park is made available for customers as it is critical to the Tesco Extra and the needs of the local community. <p>Tall buildings:</p> <ul style="list-style-type: none"> - Respondent is concerned that the inclusion of tall buildings will be detrimental to the area and will cause infrastructure overload. <p>Employment</p> <ul style="list-style-type: none"> - No evidence base has been provided to support the requirement of a new sixth form college of 2800 sqm. 	<ul style="list-style-type: none"> - Noted. The PROPOSED SUBMISSION VERSION has condensed the description. - The Site Allocation does reference student accommodation as an acceptable use. - The Site Allocation requires reprovion of retail uses. It is outside the planning process to specify operators of retail space. - Noted. The Site Allocation has been amended to reference the extant permission. - Noted. The site at Roberts Close has been included in the NSP. - Noted. However the PROPOSED SUBMISSION VERSION amends the boundaries to reflect anticipated applications for comprehensive redevelopment. - Development proposals that include parking provision will be assessed against borough-wide parking policies and the impact of the specific proposal will be considered. - Noted. The Council will seek to avoid or mitigate negative impacts of proposed development. - The Council's evidence base substantiates the requirement.
<p><u>New Policy: NSP68: Croft Street Depot</u></p>	<p>Proposed Site Allocation has not been taken forward into the PROPOSED</p>

Listed/required uses:

- Respondent considers that the existing floorspace identified is an over estimation of the B8 floor site on site; respondent records 3,209sqm and suggests amending the text to confirm that the figures are indicative and should not be taken as a development limit.
- To ensure consistency, the respondent suggests that storage and distribution should be replaced by 'data centre' as the rooms are not fitted out as office suites and are not occupied. The floorspace should therefore be considered as non-employment generating data use centre.
- Recommendation to include parking within the existing uses as it covers a significant area of the site.
- Respondent considers that the requirement for small business workspace is overly prescriptive and undermines the policy intention for the replacement of existing floorspace. However as the data centre is a non employment generating use, the replacement/retention of existing levels of businesses under DM24 is not applicable to this site and the respondent therefore proposes the removal of " redevelopment must provide small business workspace" from the site vision.
- Whilst the mixed-use approach is supported, the respondent is concerned that the policy imposes a prescribed level on redevelopment which may challenge the delivery of these key principles, respondent recommends recognising that other uses may be appropriate in this location..

Suggested amendments to Site Allocation text:

- Recommendation to remove the design and accessibility guidance as the site is not within an Archaeological Priority Zone or conservation area; the respondent does not consider the Roman coin finding to constitute design and accessibility guidance.
- Respondent proposes the expansion of other acceptable uses to include employment space, residential and data centre uses to ensure the policy is not restrictive. Similarly, the respondent proposes that required uses and other acceptable uses are combined into a single column as respondent considers that if a use is considered acceptable, it should not be prejudiced by the prescribed uses.

General comments to the amended policy:

SUBMISSION VERSION .

<ul style="list-style-type: none"> - Respondent does not consider that the reference to tree preservation is relevant nor supported as these are not protected by a Tree Preservation Order. - Respondent does not envisage any future water supply capability or wastewater infrastructure capability issues. - Representation is concerned that this development site includes excessively high residential capacity especially if this means taller buildings. - Respondent agrees with the proposal 	
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Walworth Consultation Summary

Area Vision consultation response summary:	Council's response
<ul style="list-style-type: none"> - Suggestions for general amendments of Site Allocation vision/text: - Map is difficult to read as the key and map have a different page orientation. - Respondent has commented that the Vision gives too much focus to housing instead of the protection and recognition of existing businesses and independent shops on Walworth Road. One respondent suggests that affordable housing should be encouraged. 	<ul style="list-style-type: none"> - The Area Visions maps have been updated for the PROPOSED SUBMISSION VERSION to improve clarity. - Affordable housing is a priority across the borough. The Area Vision shares the aspiration to support small retailers through the development of new workspace for small and independent businesses.

<ul style="list-style-type: none"> - Recommendation to amend the text to state that Burgess Park is valued for its outdoor wildlife, open space and open-air sports facilities, and is not suitable for indoor sports. - The term 'improve' should be defined. - Respondent has commented that the Walworth Town Hall/ Newington library should remain in the area. Two of the Site Allocations within Walworth (NSP63/47) should propose a library as one of the uses. <p>Transport/connectivity:</p> <ul style="list-style-type: none"> - Cycle routes across Burgess Park Should not be proposed as these will be disruptive to park users and pedestrians. - Area Vision should consider implementing strategies to minimise effects on traffic. - Reconsider the BLE route to run along Walworth Road. - Respondent suggests considering extending the cycle hire service beyond Burgess Park. Cycle and walking should be strongly supported in addition to air improvement quality. - Many respondents have commented that more emphasis should be given to improving green links (between parks) and green spaces rather than only housing. - The green space on the corner of Morecambe Street and Browning Street should be officially designated as an open space to honour its rich history. <p>Tall Buildings:</p> <ul style="list-style-type: none"> - Area Vision should include height limits with some respondents suggesting a 10 storey restriction outside the core business areas. - Respondent proposes the inclusion of a reference to the high street being valued by its designation within the conservation area. - Respondent comments that there is only one small Site Allocation adjacent 	<ul style="list-style-type: none"> - Any proposals for development on Burgess Park would be assessed against the New Southwark Plan policy regarding development on Metropolitan Open Land. - The term 'improve' means to make better. - The Area Vision for Walworth includes the provision of a new library. Applications for new libraries on either of the Site Allocations would be considered in conformity with the Area Vision and would be assessed against borough-wide planning policies regarding D Class uses. - The New Southwark Plan supports cycle routes which are set out in the Cycle Strategy. - All development proposals will be assessed against borough-wide transport policies. - The New Southwark Plan supports the extension of the Bakerloo Line down Old Kent Road and via Camberwell and Peckham. - See comments above regarding cycle routes. - The Area Vision shares this aspiration. Specifically the Area Vision notes 'Improve the local parks and green links between Burgess Park, Nursery Row Park, Lorrimore Square gardens, Surrey Square, Pasley Park, Faraday Gardens, Victory Community Park, Salisbury Row Park and spaces in other neighbourhoods' - The space is proposed as Other Open Space in the new Southwark Plan. - Applications for tall buildings will be assessed against the borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context. An indiscriminate height restriction would fail to optimise the full potential of all development sites (some of which may be suitable for taller buildings). - The Low Line policy applies to all sites adjacent to the Low Line walking route. A
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<p>to the Low Line and therefore development cannot 'contribute towards the development of the Low Line, a new public realm corridor adjacent to historic railway arches, with lively accessible spaces for creativity, new jobs, and retail'.</p> <p>Other amendments:</p> <ul style="list-style-type: none"> - Plans should sewerage improvement strategies in the area to keep up with the population density increase. 	<p>Site Allocation is not necessary.</p> <p>- Noted.</p>
Site Allocation consultation response summary:	Council response
<p><u>NSP63: Morrisons, Walworth Road</u></p> <p>Historic assets</p> <ul style="list-style-type: none"> - One respondent has voiced concern that the historic village centre and Horse and Groom PH have not been recognised and reflected within the Site Allocation. - Respondent is concerned about active frontages generating additional noise and litter pollution. <p>Tall Buildings:</p> <ul style="list-style-type: none"> - Initial assessment by respondent has shown that the site can accommodate additional buildings/height/mass. <p>Employment/Uses:</p> <ul style="list-style-type: none"> - Respondent wishes to ensure the flexibility of the policy to include a range of different uses including office, hotel and/or health/fitness use as a mixed-use development would be preferable. - Site Allocation should prioritise supermarket and/or retail as it is considered an important service within the area. - Suggestions for general amendments of Site Allocation vision/text: <ul style="list-style-type: none"> - Respondent proposes that a library use be added to required/other acceptable uses to re-provide the Newington Library within Walworth. - Site Allocation should support the Low Line route. 	<p>- The Site Allocation notes that the site is within the Walworth Road Conservation Area. The Conservation Area references the Horse and Groom public house.</p> <p>- Noted. All development proposals are assessed against borough-wide waste and amenity policies.</p> <p>- Noted. The Site Allocation requires re-provision of retail space.</p> <p>- Noted.</p> <p>- Site Allocation prioritises retail uses on the ground floor with active frontages. Any redevelopment must re-provide the supermarket.</p> <p>- The Area Vision supports a new library in Walworth. The Site Allocation allows for a library (D1).</p> <p>- The Site Allocation supports the Low Line.</p>

<p>Other</p> <ul style="list-style-type: none"> - Potential water supply issues. Recommendation to work together with organization to understand infrastructure requirements of sites. No concerns regarding future waste water capability. 	<ul style="list-style-type: none"> - Noted
<p><u>NSP64:330 -344 Walworth Road</u></p> <ul style="list-style-type: none"> - Suggestions for general amendments of Site Allocation vision/text: <ul style="list-style-type: none"> - Several concerns raised regarding the loss of existing businesses particularly Oli's and the Gym which are both popular services in the area which have not been listed as a required use. Two representations have expressed that the loss of the gym, even temporary, will be a significant impact on the area and its users. The absence of the re-provision of a supermarket will impact residents' access to shopping. - Respondent is concerned about the loss of 1950s architecture. <p>Site Capacity:</p> <ul style="list-style-type: none"> - The sites location is within a Major Town Centre, OA, and within an Urban Density Zone, represents a significant redevelopment opportunity. Whilst respondent is conscious that the development capacity is indicative, they do not consider that the Indicative development capacity figures do not reflect the full capacity that the site has potential to deliver. - No water/ wastewater infrastructure concerns. 	<ul style="list-style-type: none"> - The Site Allocation Requires town centre uses on the ground floor. - The building is not protected by listing. - The PROPOSED SUBMISSION VERSION removes indicative development capacities. It is accepted the optimum development capacity will be determined through detailed assessment forming part of an application. - Noted.

Further proposals for Site Allocations

The Council received a number of representations recommending new site allocations for the following sites.

- 49 Lomond Grove
- The Shell Garage Site, Croxted Road
- SG Smith Site, Dulwich village
- The Garages on Dulwich Wood Park
- Site on the east of fountain drive
- Former petrol station on Herne Hill junction with Danecroft Road
- Southwark Crown Court,
- Land at Doggett's Coat and Badge Public House

- All suggested site allocations were considered by officers. None of the sites have been proposed for allocation in the Proposed submission version .

Table 2: Record of consultation events attended by Council officers

No	Name of exercise / group	Date / Location	Summary of event
1	Old Kent Road Community Forum	7 events so far - 9th forum 14 March 2016	<ul style="list-style-type: none"> • Detailed discussion on the vision for OKR • Focus on place-making study
2	Peckham Vision Group	18/11/2015	<ul style="list-style-type: none"> • Officers presented leaflets and copy of NSP
3	Borough, Bankside and Walworth Community Council	21/11/2015	<ul style="list-style-type: none"> • Officers presented leaflets and copy of NSP • Around 50 people in attendance
4	Southwark Multi Faith Forum management committee	23/11/2015	<ul style="list-style-type: none"> • Officers introduced the consultation and answered questions community facilities and faith facilities policies. • Engagement officer from police interested in potential multi faith building.
5	Pensioners Centre AGM	25/11/2015	<ul style="list-style-type: none"> • Contact did not manage to get us on agenda
6	Elephant and Walworth Neighbourhood Forum AGM	28/11/2015	<ul style="list-style-type: none"> • Update on neighbourhood plan for E&W, election of committee members • Officers gave introduction to NSP and answered questions on the NP process. • Members may want a session on NSP in the New Year. Will be submitting NP area and forum designation and want to agree a Memorandum of Agreement with Southwark re roles and responsibilities.
7	Walworth Society	03/12/15 and 07/01/16	Officer to attend 7 January
8	Tenant and community groups attending the Digital Inclusion Project Steering Group 1	11/12/2015	
9	Bermondsey Neighbourhood Forum	16/12/2015	<ul style="list-style-type: none"> • Meeting discussed vision and update of progress on working groups and the consultation
10	STAMP	19/01/2016	<ul style="list-style-type: none"> • Meeting provides an overview of the NSP and area visions consultation and answered some questions.

11	Southwark Living Streets	21/01/2015	<ul style="list-style-type: none"> Meeting focused on transport issues, walking and cycling strategy, car parking and air pollution. Issues with trees on LendLease Scheme Policy changes from options version to preferred version summaries in relation to previous comments submitted by group Cllr Merrill also in attendance. Introduced visions and consultation.
12	Bermondsey and Rotherhithe Community Council	27/01/2016	<ul style="list-style-type: none"> Meeting theme on business and enterprise Manned a stall providing information on the NSP and the vision area consultation, with emphasis on policies relating to business, employment and training
13	Camberwell Community Council	There was one on 18/11/2015 the next one may be 30/01/16 or 03/02/16	<ul style="list-style-type: none"> Going to agenda planning
14	Dulwich Community Council	Agenda planning 16/12/15 for 27/01/16 meeting	<ul style="list-style-type: none"> Gave presentation focussed on any changes between the Issues and Options and the Preferred Option of the Plan. Highlight any locally important policies. Answered a few questions and remained until the break to answer further questions
15	Peckham and Nunhead Community Council	06/02/2015	<ul style="list-style-type: none"> Going to agenda planning
16	Creative Trust	/	<ul style="list-style-type: none"> Officer emailed to ask to attend any meetings,
18	Salisbury TRA or East Walworth AHF group	18/02/2016	<ul style="list-style-type: none"> Collection of local TRA representatives. Discussion focused on affordable housing and 11,000 homes. Critical of policies to deliver and ability to deliver that many. Opposed to Housing and Planning Bill. Also discussed OKR AAP. Extension to consultation given until 3 March
20	Walworth West AHF	14/01/2016	<ul style="list-style-type: none"> 15-20 attendee (TRA reps, councillor, officers) area housing forum with a an update and brief Q&A on the NSP PO and visions consultations Questions focused on current planning permissions and parking
21	Better Bankside NSP Workshop	14/01/2016	<ul style="list-style-type: none"> Officer attended with copies of the plans, answered questions during the break.

22	Better Bankside Board	19/01/2016	<ul style="list-style-type: none"> Officer attended with copies of the plans, answered questions during the break.
23	Waterloo Quarter BID	19/01/2016	<ul style="list-style-type: none"> Officer attended with copies of the plans, answered questions during the break.
24	TMO Liaison Committee	20/01/2016	<ul style="list-style-type: none"> 10 attendee meeting with an update on the NSP and visions consultations
25	Peckham Vision Workshop	27/01/2016	<ul style="list-style-type: none"> 150 attendee event hosted by Peckham Vision, with updated on planning policy and regeneration from attending officers Around 25 speakers from the area expressing views about the area, with active debate around gentrification and race issues and the housing crisis
26	Bankside Residents Forum	02/02/2016	<ul style="list-style-type: none"> 30-40 attendee residents forum with a PowerPoint presentation and extended Q&A session on the NSP PO and visions consultations Concerns raised included dissatisfaction with planning application and consultation processes, tall buildings, lack of on-site affordable Housing
27	Bricklayers Arms TRA	08/02/2016	<ul style="list-style-type: none"> 10 attendee TRA meeting with a Q&A session on the NSP consultations and the Old Kent Road AAP/OAPF; some negative feedback about OKR forum Lego workshop and concern about the BLA junction site

06 Feb – 28 April 2017:

No.	Name of exercise / group		Summary of event
1	Bermondsey and Rotherhithe Community Council	20/02/2017	<ul style="list-style-type: none"> Officer attended with copies of the plans, answered questions during the break. Consultation announcement was made

3	Bermondsey Street Area Partnership	02/03/2017	<ul style="list-style-type: none"> • Officer attended with copies of the plans, answered questions during the break. • Consultation announcement was made • Major concerns were expressed regarding the Bermondsey street area appearing on both area vision maps.
4	Walworth Society	02/03/2017	<ul style="list-style-type: none"> • 30-40 attendees • Introduction from chair. • PowerPoint presentation from Officer with live discussions followed by a Q&A session • Some concerns were raised regarding topics outside the NSP including the Elephant & Castle Shopping Centre application and issues with the BLE air vent in a local park.
5	Canada Water Consultative Forum	06/03/2017	<ul style="list-style-type: none"> • Officer attended with copies of the plans, answered questions during the break and provided an update on the vision and sites. • Update on the progress of delivering the aspirations of the AAP • Consultation announcement was made
7	Peckham and Nunhead community council	09/03/2017	<ul style="list-style-type: none"> • Officer attended with copies of the plans, answered questions during the break. • Consultation announcement was made
9	Dulwich Community Council	25/03/2017	<ul style="list-style-type: none"> • Officers attended with copies of the plans and answered questions.
11	Borough Bankside Walworth Community Council	29/03/2017	<ul style="list-style-type: none"> • Consultation announcement was made
12	Latin Elephant meeting	20/03/2017	<ul style="list-style-type: none"> • Officer discussed the vision and site allocations in Elephant and Castle. • Development Management officers also attended and answered specific questions regarding the planning application for the Shopping Centre.
13	Camberwell Community Council	30/03/2017	<ul style="list-style-type: none"> • Consultation announcement was made • Officers answered questions regarding Camberwell Station and New Southwark Plan
15	Albion Street Steering Group	03/04/2017	<ul style="list-style-type: none"> • Officer discussed visions and site allocation

			in Rotherhithe
16	Camberwell Society/SE5 forum meeting	06/04/2017	<ul style="list-style-type: none"> Officer discussed the vision and issues for Camberwell with both groups
17	Herne Hill Neighbourhood Forum	19/04/2017	<ul style="list-style-type: none"> PowerPoint presentation from attending Officers followed by a Q&A session. Questions focused on the Herne Hill site allocation: NSP50.
18	Future Steering Board workshop		<ul style="list-style-type: none"> Discussion of the key changes in the preferred option version of the New Southwark Plan

Interim Consultation events:

	Event	Date	Summary
1	Bermondsey and Rotherhithe Community Council	21/06/2017 & 12/09/2017	* Consultation announcement was made
2	Borough, Bankside and Walworth Community Council	26/06/2017	* Consultation announcement was made
3	Camberwell Community Council	21/06/2017	* Consultation announcement was made
4	Dulwich Community Council	26/06/2017	<ul style="list-style-type: none"> PowerPoint presentation from Officer followed by a Q&A session
5	Peckham and Nunhead Community Council	27/06/2017	* Consultation announcement was made
6	Planning Committee	04/07/2017	* Consultation announcement was made

Appendix A Consultation materials:

Email sent Friday November 4th

Dear Sir/Madam

We are currently preparing a new local development plan for Southwark called the New Southwark Plan. Last year we consulted on proposed area visions alongside potential development sites.

We have taken all comments that were submitted during this consultation into account and we are currently preparing a preferred option for a 12 week consultation commencing in early 2017.

The preferred option consultation will set out proposed development requirements for key potential development sites alongside the development strategy for Southwark's distinct areas. We welcome any further comments relating to area visions or potential development sites submitted before 1 December 2016 which will be taken into account in the drafting of the preferred option consultation document.

The proposed area visions will cover development aspirations relating to the following themes:

- Character
- Heritage
- Transport and accessibility
- The local economy
- Public spaces and buildings
- Growth opportunities
- Sub-areas with unique character

Proposed site allocations will set out development requirements for key potential development. For example, a proposed site allocation may be required to provide new public open space as part of any future redevelopment.

Please submit any comments you would like to be considered prior to the preferred option consultation by email to planningpolicy@southwark.gov.uk.

Kind regards,

Planning Policy Team

Southwark Council

planningpolicy@southwark.gov.uk

0207 525 5471

Dear Sir/Madam

New Southwark Plan Preferred Option Consultation

We are now consulting on the Preferred Option draft of the New Southwark Plan. Once adopted, the plan will form our regeneration strategy for the whole borough over the period 2017 to 2033 and help to manage the evolution of the built environment and our neighbourhoods and communities. It will replace two key borough-wide planning policy documents currently in use; the Southwark Plan (2007) and the Core Strategy (2011).

Together with the London Plan (2015) and our adopted Area Action Plans (and any future Neighbourhood Plans), the New Southwark Plan will form the borough's "development plan" that sets out the planning policies that planning applications will be determined against.

Following the comments we received on the Issues and Options New Southwark Plan consultation that took place between November 2014 and March 2015, we have revised and consolidated the draft strategic and development management planning policies that are now open for comment over the course of the Preferred Option consultation period.

The closing date for comments on the proposed policies is **12 February 2016**. Between now and then we will be attending events to promote the consultation and engaging residents, businesses and other interested stakeholders in the planning process to gather your views. Please see Southwark.gov.uk/newsouthwarkplan for more details. Copies of the draft plan will be available in all our local libraries, area housing offices and one stop shops (where they are in separate locations).

We will be running a further consultation on area visions for Southwark's neighbourhoods during Spring 2016. If you would like the planning policy team to attend a meeting or event to discuss the draft plan or the neighbourhood's vision, please get in touch with the relevant officer for your area of the borough. You can see who to contact in the consultation map, available to view and download on the New Southwark Plan downloads webpage at http://www.southwark.gov.uk/downloads/download/4346/new_southwark_plan_preferred_option.

Planning Policy

Direct line: **0207 525 5471**

Email: planningpolicy@southwark.gov.uk

We are also making a call for suggested development sites within the borough that have the potential to be added to our emerging draft schedule of development sites. This schedule takes on board suggestions for sites that came through the Issues and Options consultation. We will be consulting on the draft schedule of sites in Spring 2016, alongside the Preferred Option draft of the Old Kent Road Area Action Plan (see Old Kent Road webpage at Southwark.gov.uk/oldrentroadaap for more details).

We anticipate consulting on the final draft of the New Southwark Plan in Autumn 2016. This will be the Submission version that we will intend to submit to the Planning Inspectorate for examination in Spring 2017. Subject to the Planning Inspectorate's recommendations, we intend to adopt the New Southwark Plan in Spring/Summer 2017.

Should you wish to contact the planning policy team, please do not hesitate to get in touch via 0207 525 5471 or via email on planningpolicy@Southwark.gov.uk.

Draft Development Viability SPD

Our Draft Development Viability Supplementary Planning Document (SPD) and the supporting documents are now available to view and download at

http://www.southwark.gov.uk/info/200151/supplementary_planning_documents_and_guidance/3914/draft_development_viability_spd. The supporting documents include the report recommending the approval for the SPD to go out for consultation. Please see the webpage at the following link for information on the decision to go out for consultation at <http://modern.gov.southwark.gov.uk/mgIssueHistoryHome.aspx?IId=50008501&Opt=0>.

The SPD sets out our proposed approach to viability assessments submitted by applicants to the council to support planning applications. The draft SPD focuses specifically on development proposals which do not provide a policy compliant level of affordable housing.

The SPD proposes detailed implementation guidance on currently adopted local planning policies related to affordable housing in the Core Strategy (2011) and saved policies of the Southwark Plan (2007), as well as the London Plan (2015) and the emerging policies of the New Southwark Plan.

The decision to go out for consultation will be made by Cllr Mark Williams, Cabinet Member for Regeneration and New Homes. There is a 5 working-day call-in period from 24 November 2015 in which other councillors can scrutinise the decision and, if called in, raise questions at the overview and scrutiny committee.

There will be an informal consultation between 24 November until 5 January 2016 and a formal consultation from 5 January 2016. The consultation will close on 16 February 2016, where all comments must be received by 5pm.

Please contact Philip Waters at philip.waters@southwark.gov.uk or on 0207 525 0146 to provide comments.

ADOPTION OF THE REVISED CANADA WATER AREA ACTION PLAN (2015)

The Revised Canada Water Area Action Plan (2015) was adopted by the council on 25 November 2015.

The AAP was originally agreed in March 2012 and sets out the vision and policy that guides the development of the area. In 2011 the Daily Mail announced it would be moving its printworks away from Harmsworth Quays. We have revised the AAP to put in place a policy framework to guide a redevelopment of Harmsworth Quays and take account of the implications of this for the wider area.

Copies of the Adoption Statement, the Revised Canada Water Area Action Plan (2015), the Sustainability Appraisal, the Sustainability Appraisal Adoption statement, the Equalities Analysis, the Appropriate Assessment, the updated Adopted Policies Map and the Consultation Report are available for inspection free of charge on the council's website: www.southwark.gov.uk/canadawateraap and at:

Canada Water library, 21 Surrey Quays Road, London, SE16 7AR (Opening hours vary)
Abbeyfield Road housing services office, 153-159 Abbeyfield Road, London, SE16 2BS
(Monday - Friday, 9am-5pm)

On request at the Council's offices at 160 Tooley Street, SE1 2QH (Monday – Friday, 9am-5pm).

Any person aggrieved by the Revised Canada Water Area Action Plan (2015) may make an application to the High Court under Section 113 of the Planning and Compulsory Purchase Act 2004 on the grounds that either: -

- . (i) the Revised Canada Water Area Action Plan (2015) is not within the powers conferred by Part 2 of the Planning and Compulsory Purchase Act 2004, and/or
- . (ii) that a procedural requirement of the Act or its associated Regulations has not been complied with.

Any such application must be made promptly and in any event no later than six (6) weeks after the date on which the Revised Canada Water Area Action Plan (2015) was adopted (i.e. no later than 6 January 2016).

Submitting representations

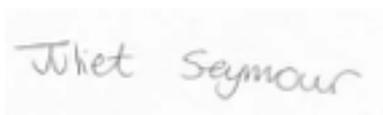
Please note that if you intend to submit a comment to us in a PDF format as part of a consultation response, please could we also request that you send a Microsoft Word version alongside to aid the administrative process of logging representations to our database.

Unsubscribe from the planning policy mailing list or update contact details

If you wish to unsubscribe your email address from the Southwark Council planning policy mailing list please email planningpolicy@southwark.gov.uk with the subject line “**unsubscribe**”. To enable us to delete/update the correct record please specify the contact details you wish to have removed/updated, as these are sometimes different from the address the unsubscribe/update request is sent from.

Yours Faithfully

Juliet Seymour
Planning Policy Manager

A handwritten signature in blue ink that reads "Juliet Seymour". The signature is written in a cursive style and is positioned above a light blue horizontal line.

Link to out consultation Questionnaire:

http://www.southwark.gov.uk/download/do%20%20plan_options_version_consultation_questi

Press notice for New Southwark Plan: Area Visions and Site allocations:

Southwark News, Thursday January 26 2017

www.southwarknews.co.uk PUBLIC NOTICES 33

NOTICE OF FORMAL CONSULTATION FOR:

1) NEW SOUTHWARK PLAN: AREA VISIONS AND SITE ALLOCATIONS (PREFERRED OPTION);
REGULATION 18 CONSULTATION UNDER THE TOWN AND COUNTRY PLANNING ACT 2004 (AS AMENDED)

2) COMMUNITY INFRASTRUCTURE LEVY, ENGLAND AND WALES: THE COMMUNITY INFRASTRUCTURE LEVY REGULATIONS 2010 (AS AMENDED)



**1) NEW SOUTHWARK PLAN: AREA VISIONS
AND SITE ALLOCATIONS (PREFERRED OPTION)**

The Council will consult on the New Southwark Plan: Area Visions and Site Allocation (preferred option) document from 6 February to 28 April 2017. The document forms the second part of the draft New Southwark Plan, which sets out the overall planning and regeneration strategy for the whole borough up to 2033. The council consulted on the New Southwark Plan: Strategic and Development Management policies (preferred option) between October 2015 and March 2017.

Area visions sets out how each of the borough's unique areas will change in the future and how their character will be preserved and enhanced. Site allocations identify potential strategic development sites and set out planning requirements that should be met in the event of redevelopment.

A final draft of the New Southwark Plan will be consulted on following the preferred option stage prior to sending the draft and any comments received to the Government's Planning Inspectorate to examine the plan and make a recommendation for adoption.

How to make a representation on the New Southwark Plan: Area Visions and Site Allocations (preferred option)

The New Southwark Plan: Area Visions and Site Allocations (preferred option) will be consulted on for 12 weeks between 6 February and 28 April 2017. All comments must be received by **5pm Friday 28 April 2017**.

The New Southwark Plan: Area Visions and Site Allocations (preferred option) and its supporting documents are available to view on the council's website at: <https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/local-plan>

You can see a hard copy of the plan at the locations listed below.

Comments can be made in writing or via email and sent to the following addresses.

Email: planningpolicy@southwark.gov.uk.

Post: FREEPOST SE1919/14
Planning Policy
Chief Executive's Department
London SE1P 5EX

**DRAFT COMMUNITY INFRASTRUCTURE LEVY (CIL)
CHARGING SCHEDULE AND REGULATION 123 LIST**

The Community Infrastructure Levy (CIL) is a levy that local authorities can choose to charge on new developments in their area. The money can be used to support new development by funding strategic infrastructure that the council, local community and neighbourhoods want.

Southwark is a CIL charging authority under the Planning Act 2008 and Community Infrastructure Levy Regulations 2010 (as amended). Southwark is proposing to revise its charging schedule which sets out the charging rate(s) (per square metre of new floorspace) to be levied on new development in the borough. These rates need to be supported by evidence including a study of the economic viability of new development and an Infrastructure Plan which sets out Southwark's infrastructure needs over the next 15 years.

We consulted on a 'Preliminary' draft CIL Charging Schedule in 2016. We are now at the second stage of preparation and are consulting on the Draft CIL Charging Schedule. Alongside this we are also consulting on a revised Regulation 123 List which is intended for adoption at the same time as the revised charging schedule.

Following this second round of consultation we will submit the Draft CIL Charging Schedule and all of the representations received during the consultation to an independent Examiner. The Draft CIL Charging Schedule will then be subject to an Examination in Public held by the independent Examiner during Summer 2017.

How to make a representation on the Draft CIL Charging Schedule (CIL Regulation 16 (2)) and Regulation 123 List

The draft CIL Charging Schedule and Regulation 123 List will be published on 30 January 2017 and will be available for consultation for a period of six weeks. All comments must be received by **5pm Monday 13 March 2017**.

The draft CIL Charging Schedule, its supporting documents and the Regulation 123 List are available to view on the council's website at: <https://www.southwark.gov.uk/planning-and-building-control/section-106-and-community-infrastructure-levy>

You can see a hard copy of the draft CIL Charging Schedule and the Regulation 123 List at the locations listed below.

Comments can be made in writing or via email and sent to the following addresses. At this stage you are also able to request if you would like the right to be heard by the CIL Examiner at the forthcoming Examination in Public hearing.

Email: planningpolicy@southwark.gov.uk.

Post: FREEPOST SE1919/14
Douglas McNab
Planning Policy
Chief Executive's Department
London SE1P 5EX

In your representation to us please also let us know if you would like to be notified at a specified address of any of the following:

(i) that the draft CIL charging schedule has been submitted to the CIL Examiner in accordance with section 212 of PA 2008,

(ii) the publication of the recommendations of the CIL Examiner and the reasons for those recommendations, and

(iii) the approval of the CIL charging schedule by the council.

If you have any queries about this document, please contact the Planning Policy team on 020 7525 5471 or by email at planningpolicy@southwark.gov.uk

LOCATIONS TO VIEW DOCUMENTS

You can request to view hard copies of our consultation documents at the Southwark Council offices, located at 160 Tooley Street, London, SE1 2QH.

You can also view our consultation documents at the following libraries and MySouthwark Service Points.

Libraries (Opening times listed individually below)

- **Blue Anchor Library:** Market Place, Southwark Park Road, SE16 3UQ
(Monday, Tuesday & Thursday 09:00 – 19:00, Friday 10:00 – 18:00, Saturday 09:00 – 17:00)
- **Brandon Library:** Muddock Way, Cooks Road, SE17 3NH
(Monday, Tuesday & Thursday 14:00 – 17:00, Friday 10:00 – 15:00, Saturday 10:00 – 17:00)
- **Camberwell Library:** 48 Camberwell Green, SE5 7AL
(Monday – Friday 09:00 – 20:00, Saturday 09:00 – 17:00, Sunday 12:00 – 16:00)
- **Canada Water Library:** 21 Surrey Quays Road, SE16 7AR
(Monday – Friday 09:00 – 20:00, Saturday 09:00 – 17:00, Sunday 12:00 – 16:00)
- **Dulwich Library:** 368 Lordship Lane, SE22 8NB
(Monday, Wednesday, Thursday & Friday 09:00 – 20:00, Tuesday 10:00 – 20:00, Saturday 09:00 – 17:00, Sunday 12:00 – 16:00)
- **East Street Library:** 168-170 Old Kent Road, SE1 5TY
(Monday, Tuesday & Friday 14:00 – 19:00, Saturday 10:00 – 17:00)
- **Grove Vale Library:** 25-27 Grove Vale, SE22 8EQ
(Monday, Tuesday & Thursday 14:00 – 17:00, Friday 10:00 – 15:00, Saturday 10:00 – 17:00)
- **John Harvard Library:** 211 Borough High Street, SE1 1JA
(Monday – Friday 09:00 – 19:00, Saturday 09:00 – 17:00, Sunday 12:00 – 16:00)
- **Kingswood Library:** Seeley Drive, SE21 8QR
(Monday – Friday 10:00 – 14:00, Tuesday & Friday 14:00 – 18:00, Saturday 13:00 – 17:00)

Continued on next page...

Please see here for the online version of the Southwark news ad on page 33 of Jan 26 2017: <https://www.southwarknews.co.uk/the-paper/26th-january-2017/>

Dear Sir/Madam

We are contacting you:

1) To confirm that we have now moved our planning policy mailing list function over to MySouthwark

2) To announce an extension to our consultation on the New Southwark Plan: Site Allocations and Area Visions preferred option

1) Planning policy mailing list

You may be receiving this email because you have already signed up to [MySouthwark](#) and have opted in to receive planning policy email updates from the council. If so, please ignore this section of the email and skip to 2) below.

If you haven't signed up to [MySouthwark](#) and opted in to receive planning policy email updates on your profile, you have received this email due to being on our mailing list which was in operation prior to moving planning policy updates over to [MySouthwark](#).

If you haven't signed up to [MySouthwark](#) and/or opted in to receive planning policy email updates on your profile because you no longer want to be contacted by the council regarding planning policy consultations, please ignore this email. Following this email we will no longer contact anyone who hasn't signed up to [MySouthwark](#) and opted in.

Last year we sent several emails to everyone on our then-current mailing list, encouraging you to sign up to the council's one-stop shop for online services, [MySouthwark](#). Through these emails we notified you that we would be transferring the planning policy service email update to [MySouthwark](#) to improve the efficiency and effectiveness of our communications.

We want as many people as possible to have the opportunity to express your views on the council's draft plans, policies and guidance for regeneration and planning in the borough. This is your final reminder to sign up to [MySouthwark](#) and opt-in to receive planning policy email notifications if you have not already done so.

From now on, unless you opt-in to receive our consultation notifications via [MySouthwark](#), we will no longer be contacting you regarding our planning policy consultations.

Please see below for a step by step how-to opt-in to receive to planning policy email notifications on your [MySouthwark](#) profile.

2) New Southwark Plan: Area Visions and Site Allocations preferred option consultation deadline extension to Friday 7 July 2017

We consulted on Part 2 of the New Southwark Preferred Option: Area Visions and Site Allocations between 6 February and 28 April 2017. This followed consultation on the New Southwark Plan Preferred Option Part 1 (Strategic and Development Management Policies) between October 2015 and February 2016.

We received a significant number of responses to the consultation which closed on 28 April 2017 and we are grateful to all who took the time to consider the proposals and respond. Following the consultation end date we have received requests for an extension to the consultation period to enable some consultees to consider proposals in more detail and to prepare a response. We are very keen to consider all views and as such **we are extending the consultation for a further six weeks to Friday 7 July 2017**. We will be unable to accept any responses provided after this date.

IMPORTANT: If you have already submitted a response to the consultation we will take this into account. You do not need to re-submit your response unless you wish to make any changes.

[View and download the area visions and site allocations document on our website here](#). You can also find the supporting documents including our consultation plan, consultation report, integrated impact assessment, which includes an equalities analysis, and the Site Allocations

Methodology Paper. You can provide comments on all supporting documents as well as the main document.

A summary of the New Southwark Plan: Area Visions and Site Allocations is provided below.

Please submit comments by the close of **Friday 7 July 2017**:

Our online consultation hub: <https://consultations.southwark.gov.uk/planning-and-regeneration/new-southwark-plan/>

Email: planningpolicy@southwark.gov.uk

Post: FREEPOST SE1919/14

New Southwark Plan

Planning Policy

Chief Executive's Department

London SE1P 5EX

If you have any queries about this document, please contact the Planning Policy team on 020 7525 5471 or by email at planningpolicy@southwark.gov.uk

Area Visions

Area Visions provide the strategic vision for the future of Southwark's distinct places and neighbourhoods. They set out key infrastructure enhancements, opportunities for public realm and transport improvements and growth opportunities for new homes and jobs. Area Visions also identify the prevailing character of different places to be renewed, retained or enhanced. Development proposals should be designed in the context of the relevant Area Vision and should demonstrate how they contribute towards realising the strategic vision for that area.

We are consulting on Area Visions for:

- Bankside and The Borough
- Bermondsey
- Blackfriars Road
- Camberwell
- Dulwich
- East Dulwich
- Elephant and Castle
- Herne Hill and North Dulwich
- London Bridge
- Nunhead
- Old Kent Road
- Peckham
- Rotherhithe
- Walworth

Site allocations

Site Allocations are planning policies which apply to key potential development sites. Site Allocations set out the land uses that must be provided as part of any redevelopment alongside other acceptable land uses that may be provided in addition to the required land uses. For example, Site Allocations may specify that development must provide new public open space, new public access routes, and new health or education facilities.

Yours faithfully

Juliet Seymour

Planning Policy Manager

Email Sent 07 February 2017:

Dear Sir or Madam

I am writing to notify you that we are currently consulting on the following planning documents:
New Southwark Plan: Area Visions and Site Allocations preferred option

We are consulting on Part 2 of the New Southwark Preferred Option: Area Visions and Site Allocations between **6 February and 28 April 2017**. This follows consultation on the New Southwark Plan Preferred Option Part 1 (Strategic and Development Management Policies) between October 2015 and February 2016. When finalised, the New Southwark Plan will be the borough-wide planning and regeneration strategy up to 2033.

See how to get involved in the consultation below.

[View and download the area visions and site allocations document on our website here.](#) You can also find the supporting documents including our consultation plan, consultation report and integrated impact assessment, which includes an equalities analysis.

[Find the area vision and sites you're interested in and leave us feedback on our online consultation hub.](#)

We are open to invitations to discuss the plan with local groups during the consultation period. Please get in touch using the contact details below.

Area Visions

Area Visions provide the strategic vision for the future of Southwark's distinct places and neighbourhoods. They set out key infrastructure enhancements, opportunities for public realm and transport improvements and growth opportunities for new homes and jobs. Area Visions also identify the prevailing character of different places to be renewed, retained or enhanced. Development proposals should be designed in the context of the relevant Area Vision and should demonstrate how they contribute towards realising the strategic vision for that area.

We are consulting on Area Visions for:

- **Bankside and The Borough**
- **Bermondsey**
- **Blackfriars Road**
- **Camberwell**
- **Dulwich**
- **East Dulwich**
- **Elephant and Castle**
- **Herne Hill and North Dulwich**
- **London Bridge**
- **Nunhead**
- **Old Kent Road**
- **Peckham**
- **Rotherhithe**
- **Walworth**

Site allocations

Site Allocations are planning policies which apply to key potential development sites. Site Allocations set out the land uses that must be provided as part of any redevelopment alongside other acceptable land uses that may be provided in addition to the required land uses. For example, Site Allocations may specify that development must provide new public open space, new public access routes, and new health or education facilities.

Note on Old Kent Road Area Vision

The detailed Area Vision for the Old Kent Road is being prepared separately through [an Area Action Plan \(AAP\)](#). The Area Vision contained in this New Southwark Plan consultation is based on the vision and detailed proposals presented in the AAP Preferred Option Version which was consulted on from June to November 2016. The Council will consider all consultation responses which were received in this previous stage of the AAP consultation in preparing an updated vision. As such, it is not necessary to resubmit any comments which have been made in respect of the Old Kent Road AAP Preferred Option consultation.

How to comment on the area visions and site allocations

Comments can be made in writing or via email and sent to the following addresses below. You can also leave comments on our online consultation hub page

here: <https://consultations.southwark.gov.uk/planning-and-regeneration/new-southwark-plan/>

Email: planningpolicy@southwark.gov.uk.

Post: FREEPOST SE1919/14

New Southwark Plan

Planning Policy

Chief Executive's Department

London SE1P 5EX

If you have any queries about this document, please contact the Planning Policy team on 020 7525 5471 or by email at planningpolicy@southwark.gov.uk

Yours faithfully

Juliet Seymour

Planning Policy Manager

Locations to view documents

As well as viewing the draft Area Visions and Site Allocations document online, you will be able to find copies of the document at the council offices at 160 Tooley Street, SE1 and in all local libraries and MySouthwark Service Points from early next week (commencing 13 February). See below for full details.

Southwark Council, 160 Tooley Street, London, SE1 2QH

Libraries (Opening times listed individually below)

- **Blue Anchor Library:** Market Place, Southwark Park Road, SE16 3UQ (Monday; Tuesday & Thursday 09:00 – 19:00, Friday 10:00 – 18:00, Saturday 09:00 – 17:00)
- **Brandon Library:** Maddock Way, Cooks Road, SE17 3NH (Monday, Tuesday & Thursday 14:00 – 17:00, Friday 10:00 – 15:00, Saturday 10:00 – 17:00)
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- **Dulwich Library:** 368 Lordship Lane, SE22 8NB (Monday, Wednesday, Thursday & Friday 09:00 – 20:00, Tuesday 10:00 – 20:00, Saturday 09:00 – 17:00, Sunday 12:00 – 16:00)
- **East Street Library:** 168-170 Old Kent Road, SE1 5TY (Monday, Tuesday & Friday 14:00 – 19:00, Saturday 10:00 – 17:00)
- **Grove Vale Library:** 25-27 Grove Vale, SE22 8EQ (Monday, Tuesday & Thursday 14:00 – 17:00, Friday 10:00 – 15:00, Saturday 10:00 – 17:00)
- **John Harvard Library:** 211 Borough High Street, SE1 1JA (Monday – Friday 09:00 – 19:00, Saturday 09:00 – 17:00, Sunday 12:00 - 16:00)
- **Kingswood Library:** Seeley Drive, SE21 8QR (Monday – Friday 10:00 – 14:00, Tuesday & Friday 14:00 – 18:00, Saturday 13:00 – 17:00)
- **Newington Temporary Library:** Elephant Artworks – Second Floor, Elephant Road, SE17 1LB (Monday - Friday 09:00 – 20:00, Saturday 09:00 – 17:00, Sunday 12:00 – 16:00)
- **Nunhead Library:** Gordon Road, SE15 3RW Monday, Tuesday & Thursday 14:00 – 19:00, Wednesday 10:00 – 15:00, Friday 10:00 – 15:00, Saturday 10:00 – 17:00)
- **Peckham Library:** 122 Peckham Hill Street, SE15 5JR (Monday, Tuesday, Thursday & Friday 09:00 – 20:00, Wednesday 10:00 – 20:00, Saturday 10:00 – 17:00, Sunday 12:00 – 16:00)

MySouthwark Service Points (Open Monday – Friday 09:00 – 17:00)

- Peckham MySouthwark Service Point – 122 Peckham Hill Street, SE15 5JR
- Walworth MySouthwark Service Point – 376 Walworth Road, SE17 2NG

Example freeholder/ leaseholder/ occupier letters sent:

Dear Sir/Madam,

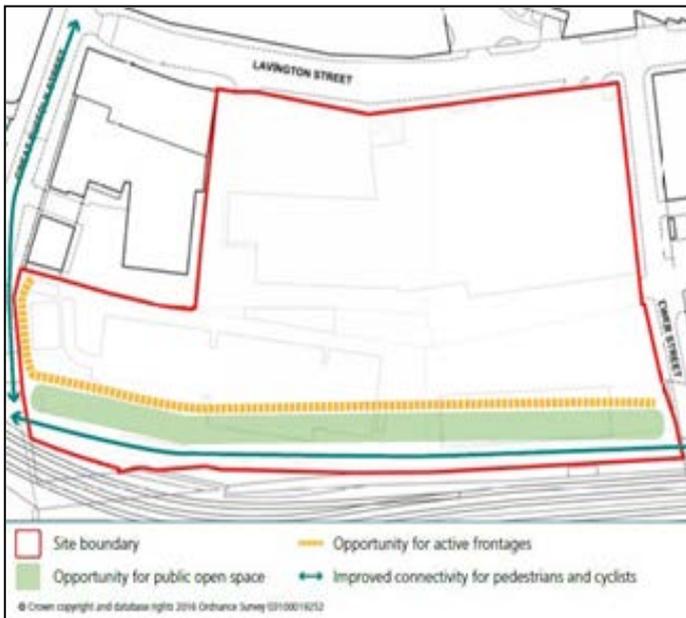
As you may be aware, Southwark Council has identified various potential key development sites as part of the wider proposed New Southwark Plan. The New Southwark Plan is a Borough-wide strategy designed to guide Southwark through numerous years of change, growth and regeneration. It is one of the ways in which the Council uses planning to preserve and enhance all of its areas. These sites have been recognized for their potential towards achieving and shaping a strategic vision for Southwark.

The council has been carrying out public consultations on the draft 'Visions and site allocations'. We are inviting freeholders and leaseholders of those designated sites for any commentary on the proposal and suggested land uses, as well as any remarks on the design guidance that has been set out. All plans and supporting documentation can be found online, at your local library or at My Southwark Service points for you to view.

We would also like to ask for specific information regarding development potential, whether the respective site allocation will be available for development and if so, any indication of timescale.

The Council has drafted the New Southwark Plan: Area Visions and Site Allocations (Preferred Option), and seek comments for the following site allocation:

NSP01: Site Bordering Great Suffolk Street and Ewer Street.



What are Site Allocations?

Site allocations comprise a detailed list of potential development sites that the council has identified for future development. Councils are required to identify and allocate development sites in their local plans to help ensure strategic needs for housing, employment, schools and health facilities and more can be met. To ensure this, the council has the opportunity to set out key land use and other requirements for each site, including indicative densities, routes through sites and any other requirements the council deem necessary.

Redevelopment of site NSP01 within the site boundary must:

- Contribute towards the thriving employment cluster in Bankside and The Borough by providing at least the amount of employment floorspace currently on the site or at least 50% of the development as employment floorspace, whichever is greater;

- Provide ground floor active frontages, including shops, restaurants and bars, onto a new public space enhancing the Low Line walking route adjacent to the railway viaduct.

Redevelopment of the site NSP01 within the site boundary may:

- Provide new homes;
- Provide new visitor accommodation.

View the New Southwark Plan: Area Visions and Site Allocations Plan (Preferred Option) Consultation Plan:

Online at: [or at your local library or at My Southwark Service Points.](#)

We welcome your comments and would like to inform you that in order to be considered, all responses should be made before the 9th of June 2017.

You may reach us:

By telephone on

Online to: planningpolicy@southwark.gov.uk

Or alternatively by writing to us through the post to : Southwark Council, Chief Executive's Department, Planning Division, Development Management, PO Box 64529, London SE1 5Lx

Yours Sincerely,

Simon Bevan

Director of Planning

Example occupier letter sent:

HSBC
15
NEW GLOBE WALK
LONDON
SE1 9DR

Simon Bevan
Director of Planning
Planning Division
Chief Executive's Department
planningpolicy@southwark.gov.uk

Tel: 0207 525 5471

Date: 08 May 2017

Ref: NSP Area Visions and Site Allocations

Dear Sir/Madam

Southwark Council is currently preparing a new borough development Plan, the New Southwark Plan. The New Southwark Plan sets out how the Council will deliver further regeneration and wider improvements for the borough in the years to come. The New Southwark Plan sets out how the different areas of Southwark will develop and the policies which will guide new developments. Planning decisions must be made in accordance with the development plan, unless other material considerations indicate otherwise.

Consultation on new proposed site allocations

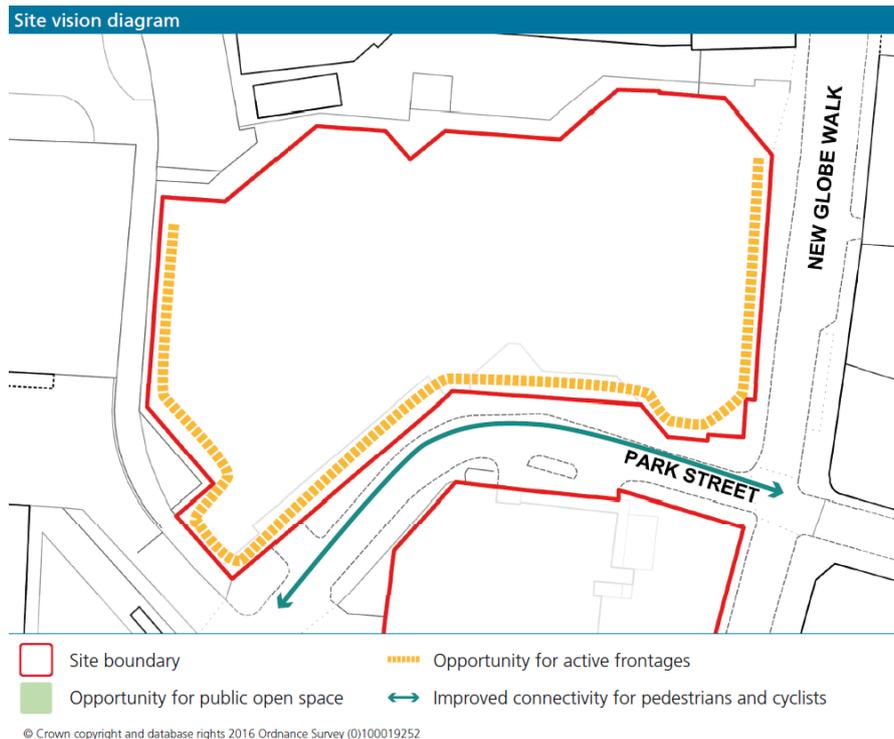
Site allocations comprise a detailed list of potential development sites that the council has identified for future development. Councils are required to identify and allocate development sites in their local plans to help ensure strategic needs for housing, employment, schools and health facilities and more can be met. To ensure this, the council has the opportunity to set out key land use and other requirements for each site, including indicative densities, routes through sites and any other requirements the council deem necessary.

As you may be aware, Southwark Council has proposed potential site allocations as part of the wider proposed New Southwark Plan. These sites have been identified for their potential opportunity towards achieving and shaping a strategic vision for the future of Southwark.

We are inviting occupiers of proposed sites for any comments on the proposals, including required and acceptable land uses, as well as design and accessibility guidance. All plans and supporting documentation can be found online, at your local library or at My Southwark Service points for you to view.

You are being consulted on the proposed site allocation below as you have been identified an occupier and are looking to gather your views

NSP02: 62-67 Park Street



Site Vision

Redevelopment of the site must:

- Contribute towards the thriving employment cluster in Bankside and The Borough by providing at least the amount of employment floorspace currently on the site or at least 50% of the development as employment floorspace, whichever is greater;
- Provide active frontages facing Park Street, New Globe Walk and the walking route to the west of the site.

Redevelopment of the site may:

- Provide new homes;
- Provide new town centre uses including shops, restaurants and bars and cultural uses;
- Provide new visitor accommodation.

The Preferred Option stage of the New Southwark Plan is an informal stage of consultation and all of the document can be changed at this stage. The formal final stage of consultation will be on the Proposed submission version of the New Southwark Plan. This is scheduled for autumn 2017.

You can view the more information about the proposed site allocation in the New Southwark Plan: Area Visions and Site Allocations (preferred option) online at: <http://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/local-plan>

Please contact us by email or telephone using the details at the top of this letter. Alternatively, you can write to us at: NSP Site Allocations, Planning Policy, LB Southwark, 5th Floor Hub 2, PO Box 64529, London, SE1P 5LX. **Please submit all comments by 19 June 2017**

Yours faithfully

Simon Bevan
Director of Planning

Press Notice for New Southwark Plan: New and Amended Consultation:

Southwark News, Thursday January 26 2017

www.southwarknews.co.uk PUBLIC NOTICES 33

NOTICE OF FORMAL CONSULTATION FOR:

**1) NEW SOUTHWARK PLAN: AREA VISIONS AND SITE ALLOCATIONS (PREFEED OPTION);
REGULATION 18 CONSULTATION UNDER THE TOWN AND COUNTRY PLANNING ACT 2004 (AS AMENDED)**

2) COMMUNITY INFRASTRUCTURE LEVY, ENGLAND AND WALES: THE COMMUNITY INFRASTRUCTURE LEVY REGULATIONS 2010 (AS AMENDED)

**1) NEW SOUTHWARK PLAN: AREA VISIONS
AND SITE ALLOCATIONS (PREFEED OPTION)**

The Council will consult on the New Southwark Plan: Area Visions and Site Allocation (preferred option) document from **6 February to 28 April 2017**. The document forms the second part of the draft New Southwark Plan, which sets out the overall planning and regeneration strategy for the whole borough up to 2033. The council consulted on the New Southwark Plan: Strategic and Development Management policies (preferred option) between October 2015 and March 2017.

Area Visions sets out how each of the borough's unique areas will change in the future and how their character will be preserved and enhanced. Site allocations identify potential strategic development sites and set out planning requirements that should be met in the event of redevelopment.

A final draft of the New Southwark Plan will be consulted on following the preferred option stage prior to sending the draft and any comments received to the Government's Planning Inspectorate to examine the plan and make a recommendation for adoption.

How to make a representation on the New Southwark Plan: Area Visions and Site Allocations (preferred option)

The New Southwark Plan: Area Visions and Site Allocations (preferred option) will be consulted on for 12 weeks between 6 February and 28 April 2017. All comments must be received by **5pm Friday 28 April 2017**.

The New Southwark Plan: Area Visions and Site Allocations (preferred option) and its supporting documents are available to view on the council's website at: <https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/local-plan>

You can see a hard copy of the plan at the locations listed below.

Comments can be made in writing or via email and sent to the following addresses.

Email: planningpolicy@southwark.gov.uk

Post: FREEPOST SE1919/14
Planning Policy
Chief Executive's Department
London SE1P 5EX

**DRAFT COMMUNITY INFRASTRUCTURE LEVY (CIL)
CHARGING SCHEDULE AND REGULATION 123 LIST**

The Community Infrastructure Levy (CIL) is a levy that local authorities can choose to charge on new developments in their area. The money can be used to support new development by funding strategic infrastructure that the council, local community and neighbourhoods want.

Southwark is a CIL charging authority under the Planning Act 2008 and Community Infrastructure Levy Regulations 2010 (as amended). Southwark is proposing to revise its charging schedule which sets out the charging rate(s) (per square metre of new floorspace) to be levied on new development in the borough. These rates need to be supported by evidence including a study of the economic viability of new development and an Infrastructure Plan which sets out Southwark's infrastructure needs over the next 15 years.

We consulted on a 'Preliminary' draft CIL Charging Schedule in 2016. We are now at the second stage of preparation and are consulting on the Draft CIL Charging Schedule. Alongside this we are also consulting on a revised Regulation 123 List which is intended for adoption at the same time as the revised charging schedule.

Following this second round of consultation we will submit the Draft CIL Charging Schedule and all of the representations received during the consultation to an independent Examiner. The Draft CIL Charging Schedule will then be subject to an Examination in Public held by the independent Examiner during Summer 2017.

How to make a representation on the Draft CIL Charging Schedule (CIL Regulation 16 (2)) and Regulation 123 List

The draft CIL Charging Schedule and Regulation 123 List will be published on 30 January 2017 and will be available for consultation for a period of six weeks. All comments must be received by **5pm Monday 13 March 2017**.

The draft CIL Charging Schedule, its supporting documents and the Regulation 123 List are available to view on the council's website at: <https://www.southwark.gov.uk/planning-and-building-control/section-108-and-community-infrastructure-levy>

You can see a hard copy of the draft CIL Charging Schedule and the Regulation 123 List at the locations listed below.

Comments can be made in writing or via email and sent to the following addresses. At this stage you are also able to request if you would like the right to be heard by the CIL Examiner at the forthcoming Examination in Public hearing.

Email: planningpolicy@southwark.gov.uk

Post: FREEPOST SE1919/14
Douglass McNab
Planning Policy
Chief Executive's Department
London SE1P 5EX

In your representation to us please also let us know if you would like to be notified at a specified address of any of the following:

- that the draft CIL charging schedule has been submitted to the CIL Examiner in accordance with section 212 of PA 2006,
- the publication of the recommendations of the CIL Examiner and the reasons for those recommendations, and
- the approval of the CIL charging schedule by the council.

If you have any queries about this document, please contact the Planning Policy team on 020 7525 5471 or by email at planningpolicy@southwark.gov.uk

LOCATIONS TO VIEW DOCUMENTS

You can request to view hard copies of our consultation documents at the Southwark Council offices, located at 160 Tooley Street, London, SE1 2QH.

You can also view our consultation documents at the following libraries and MySouthwark Service Points.

Libraries (Opening times listed individually below)

- Blue Anchor Library: Market Place, Southwark Park Road, SE16 3UQ
(Monday, Tuesday & Thursday 09:00 – 16:00, Friday 10:00 – 16:00, Saturday 09:00 – 17:00)
- Brandon Library: Maddock Way, Cooks Road, SE17 3NH
(Monday, Tuesday & Thursday 14:00 – 17:00, Friday 10:00 – 16:00, Saturday 10:00 – 17:00)
- Camberwell Library: 48 Camberwell Green, SE5 7AL
(Monday – Friday 09:00 – 20:00, Saturday 09:00 – 17:00, Sunday 12:00 – 16:00)
- Canada Water Library: 21 Surrey Quays Road, SE16 7AR
(Monday – Friday 09:00 – 20:00, Saturday 09:00 – 17:00, Sunday 12:00- 16:00)
- Dulwich Library: 368 Lordship Lane, SE22 8NB
(Monday, Wednesday, Thursday & Friday 09:00 – 20:00, Tuesday 10:00 – 20:00, Saturday 09:00 – 17:00, Sunday 12:00 – 16:00)
- East Street Library: 169-170 Old Kent Road, SE1 5TY
(Monday, Tuesday & Friday 14:00 – 19:00, Saturday 10:00 – 17:00)
- Grove Vale Library: 25-27 Grove Vale, SE22 8EQ
(Monday, Tuesday & Thursday 14:00 – 17:00, Friday 10:00 – 16:00, Saturday 10:00 – 17:00)
- John Harvard Library: 211 Borough High Street, SE1 1JA
(Monday – Friday 09:00 – 19:00, Saturday 09:00 – 17:00, Sunday 12:00 - 16:00)
- Kingswood Library: Sealey Drive, SE21 6QR
(Monday – Friday 10:00 – 14:00, Tuesday & Friday 14:00 – 18:00, Saturday 13:00 – 17:00)

Continued on next page...

Please see here for the online version of the press ad on page 43 of the paper issues 29 June 2017.: <https://www.southwarknews.co.uk/the-paper/29th-june-2017/>

Notice of Interim Consultation:

**PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)
THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS
2012**

NOTICE OF FORMAL CONSULTATION (REGULATION 18) FOR:

**1) NEW SOUTHWARK PLAN: PROPOSED NEW AND AMENDED PREFERRED OPTION
POLICIES**

**2) THE OLD KENT ROAD AREA ACTION PLAN: PROPOSED NEW AND AMENDED
POLICIES AND PROPOSED CHANGES TO THE ADOPTED POLICIES MAP**

New Southwark Plan

The council is consulting on the [New Southwark Plan: New and amended policies preferred option](#). The New Southwark Plan sets out the overarching planning and regeneration strategy for the whole borough up to 2033. The document includes several new and amended planning policies and site allocations alongside a new area vision for Crystal Palace and Gipsy Hill. These new and amended policies and new area vision has been prepared in response to previous consultations.

The council consulted on the New Southwark Plan: Strategic and Development Management policies (preferred option) between October 2015 and February 2016. The council is also currently consulting on draft Area Visions and Site Allocations from 6 February to 7 July 2017. You can still submit comments for the Site Allocations and Area Visions consultation on our [consultation hub](#) or using the details below.

- **Planning policies** set out the requirement which development proposals must conform to in order to obtain planning permission.
- **Area visions** sets out how each of the borough's unique areas will change in the future and how their character will be preserved and enhanced.
- **Site allocations** identify potential strategic development sites and set out planning requirements that should be met in the event of redevelopment.

Old Kent Road Area Action Plan

Southwark Council is preparing a new plan for the Old Kent Road and surrounding area. The plan will guide and manage new development and growth in the area over the next 20 years. The plan aims to create a new high street environment for the Old Kent Road, with significant public transport improvements supported by mixed use development behind the road. This will incorporate around 20,000 new homes, including affordable homes, new jobs, community facilities and green spaces. The plan includes the potential for extending the Bakerloo Line from Elephant and Castle towards Lewisham with two new stations along the Old Kent Road. The plan will be used to make planning decisions in the area and to coordinate and deliver the regeneration strategy.

The draft [Old Kent Road AAP: New and amended preferred option policies](#) proposes new and amended policies and sites which have been prepared following consultation responses to the draft plan received in the consultation from June to November 2016.

Following this "interim" preferred option stage consultation, final drafts of the New Southwark Plan and the Old Kent Road AAP will be consulted on prior to sending the final draft and any comments received to the Government's Planning Inspectorate to examine the plan and make a recommendation for adoption.

How to make a representation on:

1) the New Southwark Plan: New and Amended Preferred Option Policies

and

2) Old Kent Road Area Action Plan: Proposed New and Amended Preferred Option Policies

Both sets of new and amended preferred option policies will be consulted on for 12 weeks between 21 June and 13 September 2017. All comments must be received by **5pm Wednesday 13 September 2017.**

Comments can be made via our online consultation hub page which can be accessed from: <https://consultations.southwark.gov.uk/>

Please refer to our website the locations where you can view a hard copy of the documents at: <http://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy>

Yours sincerely

Planning Policy Team

planningpolicy@southwark.gov.uk.

0207 525 5471

Letters posted to addresses on our old mailing list prompting them to sign up to MySouthwark:

Simon Bevan
Director of Planning
Planning Division
Chief Executive's Department
planningpolicy@southwark.gov.uk

Tel: 0207 525 5471

Date: 22 June 2017

**Ref: Planning Policy
Consultations**

Dear Sir/Madam

**Important Action Required: Planning Policy consultations
Sign up to MySouthwark account online to receive consultation updates**

We are writing to you about planning policy consultations in which we would like to make sure you have the opportunity to get involved.

What is planning policy?

Planning policies and guidance sets out how new development proposals will be assessed by the council, and how they should be designed, what they should provide for the community and more. The policies are contained in various plans and guidance documents, which together set out the planning and regeneration strategy for the borough over medium term future. The council wants to make sure your views about our draft plans are captured and make sure you have the opportunity to help shape the draft policies and guidance.

Why are you contacting me/my organisation?

The council set out who, what and how we would consult on planning policy and planning applications in our "Statement of Community Involvement," (SCI) originally published in 2008. It is likely that either you or your organisation (or a previous iteration of your organisation) was listed in the 2008 SCI, which is why we're contacting you. We are contacting you as a person, body, organisation or community group with an interest in the future of your neighbourhood and Southwark, to tell you how you can make sure you're informed about our planning policy consultations and use your opportunity to have your say.

What's changing for planning policy consultations?

We would like all community organisations to be signed up to MySouthwark, the council's one stop shop of online services. Using MySouthwark you can opt-in to receive planning policy email updates about consultations, so you'll never miss the opportunity to get involved. Using MySouthwark makes the council's outreach more efficient and more effective, saves money and is more environmentally friendly.

What next?

If your organisation already has a MySouthwark account, please log in and click on the “*profile*” button at the top of your browser window, then the “*settings*” button and then “*news, alerts and notifications*.” Click the tick box for planning policy consultations to opt-in to receiving planning policy consultation updates. If you/your organisation doesn’t currently have a MySouthwark account and would like to stay up to date, please sign up here: <https://www.southwark.gov.uk/mysouthwark>

We strongly encourage the use of a shared email address for your organisation which can be accessed by all members or can be passed on to the next responsible person. If you use a personal/personalised email address to receive updates which are intended to inform your whole team/organisation there is a risk that your colleagues/fellow group members will miss out on consultation notifications should the person responsible for sharing information leave or cease to fulfil this role.

We are looking to reduce the number of letters we send out. If you would still like to be contacted by letter please contact the planning policy team by email or telephone using the contact details at the top of this letter, or by post to:

FREEPOST SE1919/14
Planning Policy mailing list
Chief Executives Department
London
SE1P 5EX

Please see the next page for the latest email about a consultation which opened on Wednesday 21 June 2017 and which closes on Wednesday 13 September 2017. The consultation relates to the draft borough-wide local plan (the New Southwark Plan) and the Old Kent Road Area Action Plan, which sets out the regeneration strategy for the Old Kent Road Opportunity Area. Please sign up to MySouthwark and opt-in to receive updates to receive emails like this in the future.

Yours faithfully



Simon Bevan
Director of Planning

Example letter sent to occupiers

Planning Policy
planningpolicy@southwark.gov.uk

Tel: 0207 525 5471

Date: 24 July 2017

**Ref: NSP New and Amended Policies Preferred
Option**

Dear Sir/Madam

Southwark Council is preparing a new borough development plan called the New Southwark Plan. We are currently holding an interim consultation on new and amended policies and site allocations. The New Southwark Plan sets out how the council will deliver further regeneration and wider improvements for the borough in the years to come. The New Southwark Plan sets out how the different areas of Southwark will develop and the policies which will guide new developments. Planning decisions must be made in accordance with the development plan, unless other material considerations indicate otherwise.

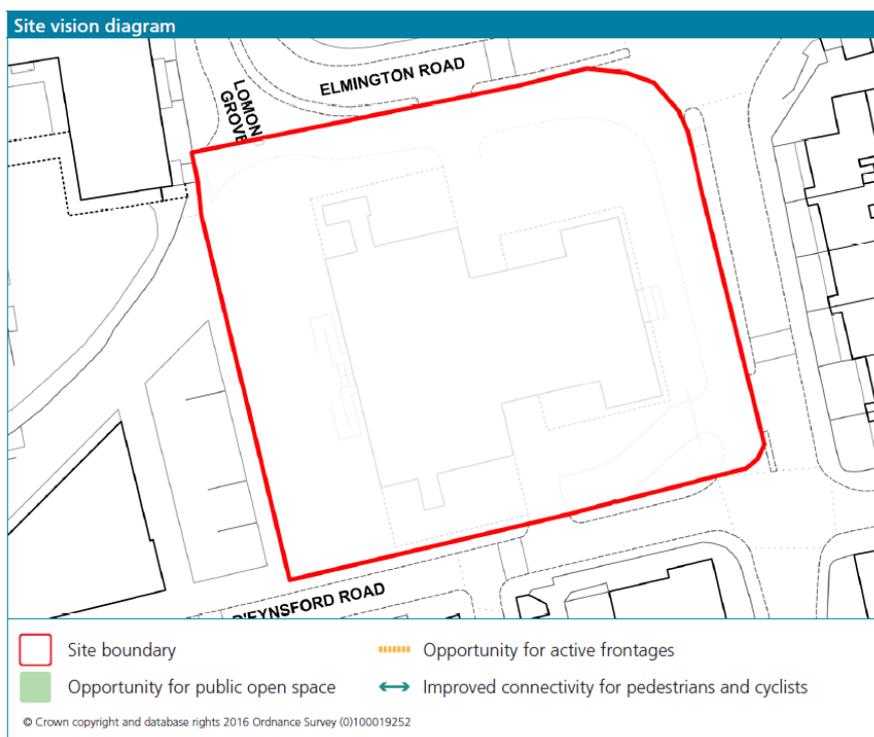
Consultation on new proposed site allocations

Site allocations comprise a detailed list of potential development sites that the council has identified for future development. Councils are required to identify and allocate development sites in their local plans to help ensure strategic needs for housing, employment, schools and health facilities and more can be met. To ensure this, the council has the opportunity to set out key land use and other requirements for each site, including indicative densities, routes through sites and any other requirements the council deem necessary.

As you may be aware, Southwark Council has proposed potential site allocations as part of the wider proposed New Southwark Plan. These sites have been identified for their potential opportunity towards achieving and shaping a strategic vision for the future of Southwark.

We are inviting occupiers of proposed sites for any comments on the proposals, including required and acceptable land uses, as well as design and accessibility guidance. Hard copies of the plan can be found online, at your local library or at My Southwark Service points for you to view. Supporting documents are available to view and download online.

You are being consulted on the proposed site allocation overleaf as you have been identified an occupier and are looking to gather your views
NSP06: Camberwell Green Magistrates Court



Site vision

Redevelopment of the site must:

- Contribute towards the thriving small business, creative and cultural employment cluster in Camberwell and Peckham providing at least 50% of the development as employment floorspace;

Redevelopment of the site may:

- Provide new homes;
- Provide town centre uses.

The Preferred Option stage of the New Southwark Plan is an informal stage of consultation and all of the document can be changed at this stage. The formal final stage of consultation will be on the Proposed submission version of the New Southwark Plan. This is scheduled for autumn 2017.

You can view the more information about the proposed site allocation in the New Southwark Plan: New and Amended Policies (preferred option) online at: <http://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/local-plan>

Please leave comments via our consultation hub on <https://consultations.southwark.gov.uk> Please contact us by email or telephone using the details at the top of this letter should you have any questions about the consultation of the plan. Alternatively, you can write to us at:

FREEPOST SE1919/14

New Southwark Plan June 2017

Planning Policy

Chief Executive's Department

London SE1P 5EX

Please submit all comments by 13 September 2017

Yours faithfully,
Planning Policy Team

Email notification sent to TRAs sent 23 June 2017



Simon Bevan

Director of Planning

Planning Division

Chief Executive's Department

planningpolicy@southwark.gov.uk

Tel: 0207 525 5471

Date: 23 June 2017

Ref: Planning Policy Consultations

Dear Sir/Madam

Important Action Required for TRAs: Planning Policy consultations Sign up to MySouthwark account online to receive consultation updates

We are writing to all Tenants and Residents Associations & TMOs about planning policy consultations to make sure you have the opportunity to get involved.

What is planning policy?

Planning policies and guidance sets out how new development proposals will be assessed by the council, and how they should be designed, what they should provide for the community and more. The policies are contained in various plans and guidance documents, which together set out the planning and regeneration strategy for the borough over medium term future. The council wants to make sure your views about our draft plans are captured and make sure you have the opportunity to help shape the draft policies and guidance.

Why are you contacting me/my organisation?

The council set out who, what and how we would consult on planning policy and planning applications in our "Statement of Community Involvement," (SCI) originally published in 2008. It is likely that your TRA (or a previous iteration of it) was listed in the 2008 SCI, which is why we're contacting you. We are contacting you as a community group with an interest in the future of your neighbourhood and Southwark, to tell you how you can make sure you're informed about our planning policy consultations and use your opportunity to have your say.

What's changing for planning policy consultations?

We would like all community organisations to be signed up to MySouthwark, the council's one stop shop of online services. Using MySouthwark you can opt-in to receive planning policy email updates about consultations, so you'll never miss the opportunity to get involved. Using MySouthwark makes the council's outreach more efficient and more effective, saves money and is more environmentally friendly.

What next?

If you/your TRA/TRA chair/TRA secretary already has a MySouthwark account, please log in and click on the "profile" button at the top of your browser window, then the "settings" button and then "news, alerts and notifications." Click the tick box for planning policy consultations to

opt-in to receiving planning policy consultation updates. If your/your TRA/TRA chair/TRA secretary doesn't currently have a MySouthwark account and would like to stay up to date, please sign up here: <https://www.southwark.gov.uk/mysouthwark>

We strongly encourage the use of a shared email address for your TRA which can be accessed by all members or can be passed on to the next responsible person. If you use a personal/personalised email address to receive updates which are intended to inform your TRA members, there is a risk that your fellow TRA members will miss out on consultation notifications should the person responsible for sharing information leave or cease to fulfil this role.

We are looking to reduce the number of letters we send out. If you would still like to be contacted by letter please contact the planning policy team by email or telephone using the contact details at the top of this letter, or by post to:

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Chief Executives Department
London
SE1P 5EX

Please see the next page for the latest email about a consultation which opened on Wednesday 21 June 2017 and which closes on Wednesday 13 September 2017. The consultation relates to the draft borough-wide local plan (the New Southwark Plan) and the Old Kent Road Area Action Plan, which sets out the regeneration strategy for the Old Kent Road Opportunity Area. Please sign up to MySouthwark and opt-in to receive updates to receive emails like this in the future.

Yours faithfully



Simon Bevan
Director of Planning

Example letter sent to landowners:

Planning Policy
planningpolicy@southwark.gov.uk

Tel: 0207 525 5471

Date: 27 July 2017

**Ref: NSP New and Amended Policies Preferred
Option**

Dear Sir/Madam

Southwark Council is currently preparing a new borough development Plan, the New Southwark Plan and we are currently holding an interim consultation on new and amended policies and site allocations. The New Southwark Plan sets out how the Council will deliver further regeneration and wider improvements for the borough in the years to come. The New Southwark Plan sets out how the different areas of Southwark will develop and the policies which will guide new developments. Planning decisions must be made in accordance with the development plan, unless other material considerations indicate otherwise.

Consultation on new proposed site allocations

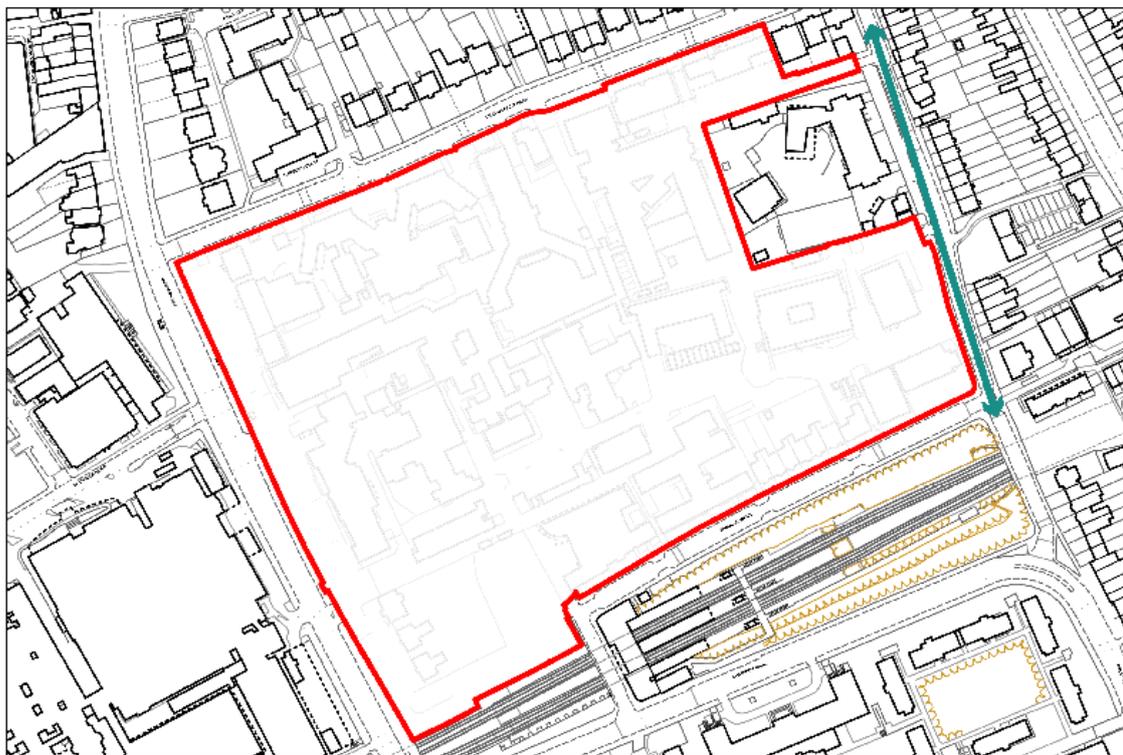
Site allocations comprise a detailed list of potential development sites that the council has identified for future development. Councils are required to identify and allocate development sites in their local plans to help ensure strategic needs for housing, employment, schools and health facilities and more can be met. To ensure this, the council has the opportunity to set out key land use and other requirements for each site, including indicative densities, routes through sites and any other requirements the council deem necessary.

As you may be aware, Southwark Council has proposed potential site allocations as part of the wider proposed New Southwark Plan. These sites have been identified for their potential opportunity towards achieving and shaping a strategic vision for the future of Southwark.

We are inviting freeholders and leaseholders of proposed sites to comment on the proposed site allocations. Comments could include required and acceptable land uses, as well as design and accessibility guidance. All plans and supporting documentation can be found online, at your local library or at My Southwark Service points for you to view.

We also welcome specific information regarding development potential, whether the respective site allocation will be available for development and if so, any indication of timescale.

You are being consulted on the proposed site allocation below as you have been identified as a freeholder or leaseholder with an interest in the land.
NSP70: Denmark Hill Campus East



© Crown copyright and database rights 2016 Ordnance Survey (0)100019252

Site Vision

Redevelopment of the site must:

- Provide health, research and education facilities or otherwise support the functioning of the Denmark Hill health cluster;

Redevelopment of the site may:

- Provide student or key worker housing

You can view the more information about the proposed site allocation in the New Southwark Plan: Area Visions and Site Allocations (preferred option) online at: <http://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/local-plan>

Please contact us via our consultation hub on <https://consultations.southwark.gov.uk> Please contact us by email or telephone using the details at the top of this letter. Alternatively, you can write to us at:

NSP N&APPO
Planning Policy,
LB Southwark
5th Floor Hub 2,
PO Box 64529,
London, SE1P 5LX.

Please submit all comments by 13 September 2017.

Yours faithfully
Planning Policy Team

Example letter sent to occupiers

Planning Policy
planningpolicy@southwark.gov.uk
Tel: 0207 525 5471
Date: 24 July 2017

**Ref: NSP New and Amended Policies Preferred
Option**

Dear Sir/Madam

Southwark Council is preparing a new borough development plan called the New Southwark Plan. We are currently holding an interim consultation on new and amended policies and site allocations. The New Southwark Plan sets out how the council will deliver further regeneration and wider improvements for the borough in the years to come. The New Southwark Plan sets out how the different areas of Southwark will develop and the policies which will guide new developments. Planning decisions must be made in accordance with the development plan, unless other material considerations indicate otherwise.

Consultation on new proposed site allocations

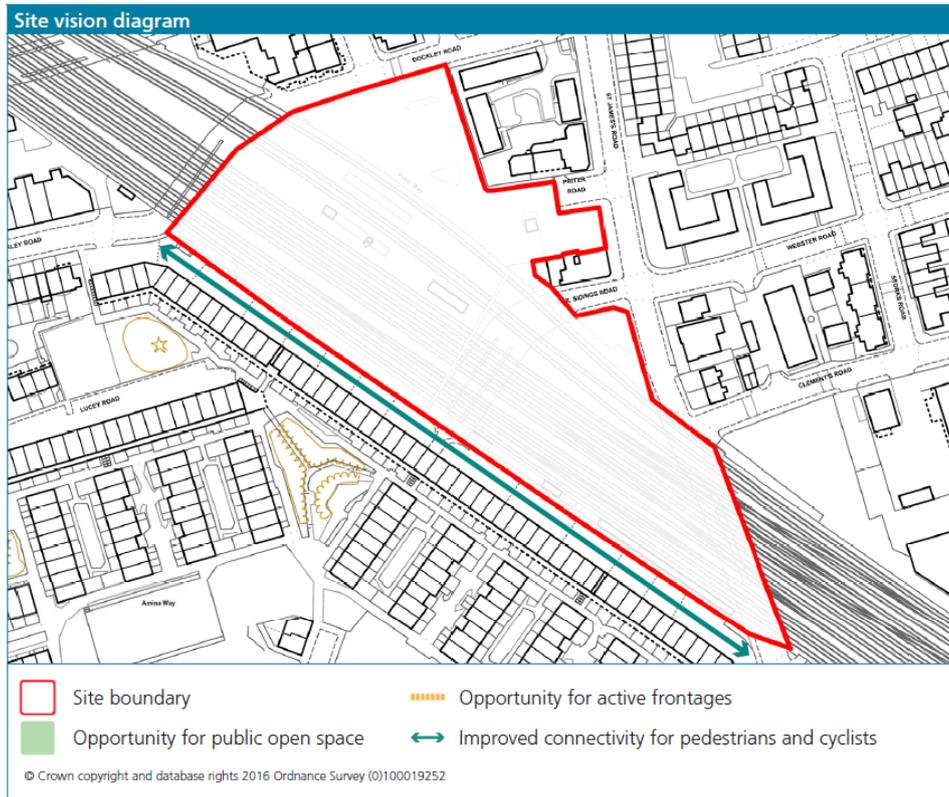
Site allocations comprise a detailed list of potential development sites that the council has identified for future development. Councils are required to identify and allocate development sites in their local plans to help ensure strategic needs for housing, employment, schools and health facilities and more can be met. To ensure this, the council has the opportunity to set out key land use and other requirements for each site, including indicative densities, routes through sites and any other requirements the council deem necessary.

As you may be aware, Southwark Council has proposed potential site allocations as part of the wider proposed New Southwark Plan. These sites have been identified for their potential opportunity towards achieving and shaping a strategic vision for the future of Southwark.

We are inviting occupiers of proposed sites for any comments on the proposals, including required and acceptable land uses, as well as design and accessibility guidance. Hard copies of the plan can be found online, at your local library or at My Southwark Service points for you to view. Supporting documents are available to view and download online

You are being consulted on the proposed site allocation overleaf as you have been identified an occupier and are looking to gather your views

NSP66: Discovery Business Park and Railway Arches



Site vision

Redevelopment of the site must:

- Provide business and industrial space

The Preferred Option stage of the New Southwark Plan is an informal stage of consultation and all of the document can be changed at this stage. The formal final stage of consultation will be on the Proposed submission version of the New Southwark Plan. This is scheduled for autumn 2017.

You can view the more information about the proposed site allocation in the New Southwark Plan: New and Amended Policies (preferred option) online at: <http://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/local-plan>

Please leave comments via our consultation hub on <https://consultations.southwark.gov.uk> Please contact us by email or telephone using the details at the top of this letter should you have any questions about the consultation of the plan. Alternatively, you can write to us at:

FREEPOST SE1919/14
 New Southwark Plan June 2017
 Planning Policy
 Chief Executive's Department
 London SE1P 5EX

Please submit all comments by 13 September 2017

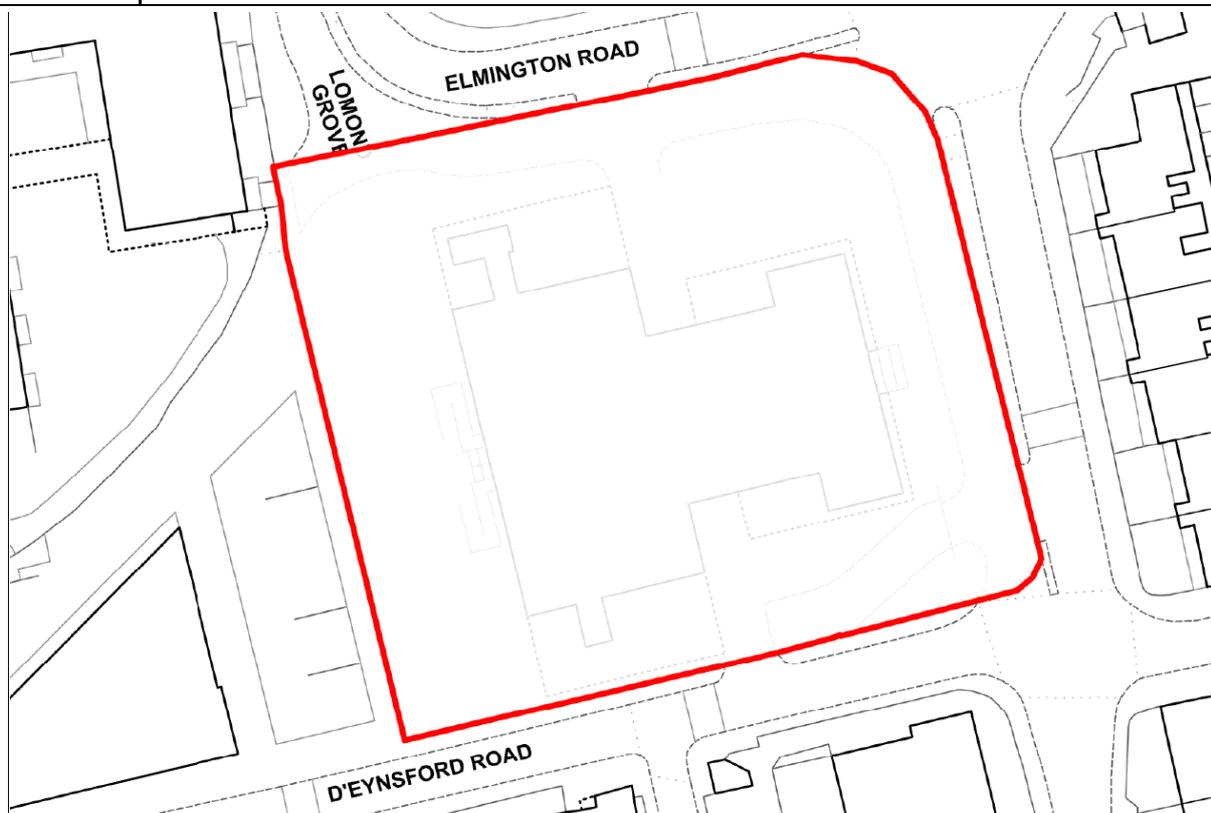
Yours faithfully,
 Planning Policy Team

PLANNING NOTICE

We are seeking comments on draft Site Allocations for the New Southwark Plan until 13 September 2017. The land identified below has been proposed as a site allocation, one of Southwark's key potential development sites.

NSP06

Camberwell Green Magistrates Court



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View draft Area Visions and Site Allocations for the New Southwark Plan

- Online: <http://www.southwark.gov.uk/planning-and-building-control/planning-consultation>
- At your local library or at My Southwark Service Points

We welcome your comments

- Online: <https://consultations.southwark.gov.uk/planning-and-regeneration/new-southwark-plan-draft-site-allocations>
- By post: FREEPOST SE1919/14, New Southwark Plan, Planning Policy, Chief Executives Department, London SE1P 5EX

Simon Bevan
Director of Planning

Sign up to receive consultation notification emails on Southwark planning policy: <https://my.southwark.gov.uk/>