

**New Southwark Plan  
Main Modifications  
December 2021**

**Consultation Report**

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## 1. Introduction

### THE NEW SOUTHWARK PLAN

1. The New Southwark Plan (NSP) is a statutory planning document that will provide an overarching strategy for managing growth and development across the borough for the next 15 years. The plan sets out how we will deliver further regeneration and wider improvements to our borough in the years to come.
2. The New Southwark Plan explains our strategy for regeneration from 2019 to 2036. It:
  - Sets policies to support the provision of new homes including 11,000 new Council homes
  - Protects our existing schools and community facilities in the borough and provides more where this is needed
  - Protects local businesses and attracts more businesses into the borough to increase job opportunities
  - Supports our high streets and increases the range of shops to increase their vitality
  - Directs growth to certain areas of the borough, predominantly in the Old Kent Road, Elephant and Castle, Canada Water, East Walworth, Blackfriars Road, Bankside and along the River Thames where there is greater public transport accessibility
  - Introduces policies to improve places by enhancing local distinctiveness and protecting our heritage assets
  - Sets policies to provide more green infrastructure, tackle the climate emergency and to promote opportunities for healthy activities.
3. The NSP is a spatial plan. Not only does it set out planning policies to guide development, it also explains how development will be delivered and may inform future decisions about investment in infrastructure. The final NSP referred to as the 'Southwark Plan 2022' will replace the saved policies of the Southwark Plan 2007 and the Core Strategy 2011 and will be used to make decisions on planning applications. The Aylesbury Area Action Plan (2010), the Peckham and Nunhead Area Action Plan (2014) and the Canada Water Area Action Plan (2015) will be rescinded on adoption of the Southwark Plan 2022.

4. This consultation report summaries the consultation process of the NSP Main Modifications, which was open for seven weeks from **6 August to 24 September 2021**.
5. The Main Modifications consultation comprised material changes to the submitted plan which are necessary to make it sound and legally compliant. Main modifications can only be recommended by Inspectors from the Planning Inspectorate at the request of the Local Planning Authority. The council asked the Inspectors under section 20(7C) of the 2004 Planning and Compulsory Purchase Act as amended) to recommend ‘main modifications’ (changes that materially affect the policies) to make the submitted local plan sound and legally compliant on 21 May 2021 (EIP233). The Inspector’s wrote a Post-Hearings Letter to the Council on 28 May 2021 (EIP236). This consultation sought comments only relating to the main modifications.
6. “Additional modifications” (minor modifications) are proposed non-consequential amendments to the Plan that are not necessary for soundness. These generally involve changes that enhance the clarity of the plan without materially affecting the implementation of plan policies and to provide factual updates. The examination did not concern itself with ‘additional modifications’ and these changes are a matter for the Council to make to the plan. However, when consulting on main modifications, a schedule of additional modifications were published for completeness.
7. This consultation report should be read alongside the **Southwark Plan 2022** (final version to be adopted by Cabinet and Council Assembly) and the **Main Modifications to the New Southwark Plan (EIP219)**. The Main Modifications document is also supported by the **Schedule of Changes to the Policies Map**, an **Updated Integrated Impact Assessment** (July 2021) (EIP224) an **Updated Equalities Impact Assessment** (June 2021) (EIP225b and c), the **Additional Modifications to the New Southwark Plan** (EIP238) and the **Main Modifications Consultation Plan (EIP239)**.
8. All documents can be found on the [Examination website](#) along with all the supporting documents, evidence base and examination documents that have been submitted to the Planning Inspectorate.

## Test of Soundness

9. The aim of the Main Modifications consultation was to ask whether the plan is legal and if the policies are achievable and are based on a robust evidence base. This is known as the ‘Test of Soundness’ which is detailed below:

### *Is the Local Plan Legal?*

10. A plan is considered legal when it complies with section 20(5) (a) of the Planning and Compulsory Purchase Act 2004.

11. Legal compliance considerations:

- Whether the Local Plan has regard to national policy and guidance issued by the Secretary of State.
- Whether the Local Plan has been prepared in-line with Southwark Council's Local Development Scheme (LDS).
- Whether community consultation has been carried out in accordance with Southwark Council's adopted Statement of Community Involvement.
- Whether an Integrated Impact Assessment assessing social, environmental and economic factors has been prepared and made public.
- Whether the requirements of the Duty to Co-operate have been met. The Localism Act, section 110, and the National Planning Policy Framework, paragraphs 24 to 27, creates a duty on all local planning authorities and other bodies to cooperate with each other to address strategic issues in the preparation of the Local Plan.

### *Is the Local Plan 'Sound'?*

12. As part of the examination, the independent Planning Inspector was required to consider if the New Southwark Plan has been positively prepared, justified, effective, and is consistent with national policy.

13. Respondents were asked to consider the following before making a representation on the Soundness of the New Southwark Plan:

- **Positively Prepared:** This means that Southwark Council have objectively assessed the need for homes, jobs, services and infrastructure and these have been delivered sustainably.
- **Justified:** This means that the Plan is based upon a robust and credible evidence base.
- **Effective:** This means that the Plan is achievable.
- **Consistent with national policy:** Is the Local Plan in accordance with the National Planning Policy Framework, the London Plan, other policies or includes clear and convincing reasons for doing something different?

## 2. Consultation Process

### CONSULTATION TIMETABLE

14. Several stages for the New Southwark Plan have already been undertaken, as per the table below:

<b>Stage</b>	<b>Date</b>
Issues and Options	October 2014 to March 2015
Preferred Options	October 2015 to February 2016
Area Visions and Site Allocations	February to July 2017
New and Amended Policies	June to September 2017
Proposed Submission Version	October 2017 to February 2018
Amended Policies	January 2019 to May 2019
Proposed Changes to the Submitted Version	August to October 2020
Examination in Public	February to April 2021
<b>Main Modifications consultation</b>	<b>August to September 2021</b>

15. At the stages where public consultation was undertaken, numerous public consultation events were carried out with residents, local groups, businesses and other stakeholders prior to the Examination in Public. These are detailed in the [EIP71 – NSP Consultation Report \(updated June 2020\)](#).

### 3. Summary of Consultation

#### WHO WAS CONSULTED AND HOW?

16. At the Main Modifications stage, the council consulted a range of local groups, interested individuals, statutory consultees and important stakeholders.

17. These included:

- Local Residents
- Local businesses
- Local community and special interest groups
- The Mayor of London and London Boroughs
- Landowners, developers and their representatives
- Statutory consultees such as the Environment Agency, Historic England
- Non statutory but important stakeholders such as Thames Water and Network Rail

18. All statutory and non-statutory consultees on the planning policy database (10,000+) were emailed and a questionnaire was published on the Consultation Hub. A separate email was sent to contacts that previously commented on the New Southwark Plan. A press notice was published in Southwark News and notifications of the public consultation were also posted on Southwark Council's social media. Appendices 3 to 6 provide all of the consultation material.

#### REPRESENTATIONS RECEIVED AND OFFICER RESPONSES

19. Appendix 1 provides a list of respondents. In total, 68 representations were received. Appendix 2 captures the main themes and summaries of each representation received and officer's responses.

#### **4. What Happens Next?**

20. The consultation responses have been sent to and considered by the Inspectors.
21. The Inspectors have published their final Inspector's report which sets out the Main Modifications required for soundness of the Plan.
22. The Inspector's report contains their assessment of the New Southwark Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers:
  - whether the Plan's preparation has complied with the duty to co-operate;
  - whether the Plan is compliant with the legal requirements; and
  - whether it is sound as set out in the National Planning Policy Framework (NPPF) 2021 (paragraph 35) which is clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
23. The Report concludes that the Duty to Cooperate has been met and that with the recommended main modifications set out in the Appendix, the New Southwark Plan satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound. This marks the completion of the Examination.
24. The Southwark Plan 2022 will be presented at the December Cabinet meeting (7 December 2021) to agree the plan for adoption at Council Assembly in February 2022.
25. The policy and site allocation numbering in the Southwark Plan 2022 have been updated throughout and therefore they may differ to the numbering set out below in the representation summaries and the officer responses.

## **Appendix 1 – full list of respondents**

<b>Name of respondent (letter/email)</b>	<b>Name of respondent (consultation hub)</b>
The Coal Authority	Antonio Lorenzo
Ralph Luck - Kings' College London	Luke Blaney
Sport England	Sam Taylor-Wilmshurst
Natural England	James Coldwell
Jerry Flynn	Tom Clarke on behalf of Theatres Trust
Susan Crisp	Sarah Hind
Planning Potential on behalf of Fitzroy Property Management LLP	Eleanor Massey
Rolf Judd on behalf of London School of Economics & Political Science	Jean Rogers
Savills on behalf of KMP Group	Liam Hennessy
DP9 on behalf of Art Invest Real Estate	Martin Hetherington
DP9 on behalf Peachtree Services	Thomas Ulicsak, Burgess Sports
The Planning Lab on behalf of trustees of Tate Gallery	Anne Roache
Residents of Brideale Close Traveller Site	Marcus Clissold-Lesser
Stuart Carruthers	Tracey Beresford
Savills ON BEHALF OF THAMES WATER UTILITIES LTD	Mike Priaux, Swifts Local Network: Swifts and Planning Group
Southwark Law Centre	Catriona Sinclair, Friends of Burgess Park
DP9 on behalf of Guys St Thomas Foundation	Marc Hauer and Jenny Topper
Spatial Planning on behalf of Transport for London	
WSP on behalf of Apex Capital Partners	
Savills on behalf of Safestore	
Steve Lancashire	
Southwark Law Centre	
Daniel Watney on behalf of William Say Ltd	
Daniel Watney on behalf of P Wilkinson Containers Ltd	
Team London Bridge	
Berkeley Capital	
Southwark Law Centre on behalf of South Dock Marina Berth Holder Association	

Name of respondent (letter/email)	Name of respondent (consultation hub)
ROK Planning on behalf of Unite Group	
Southwark Law Centre on behalf of XR Southwark Lobbying Group	
Gerald Eve on behalf of Landsec	
TfL Commercial Development	
Montagu Evans on behalf of Guys and St Thomas NHS Foundation Trust - Vinegar Yard	
ROK Planning on behalf of Shurgard	
Turley on behalf of Watkin Jones	
Eileen Conn	
Turley on behalf of Alumno Group	
Savills on behalf of Newington Square	
Savills on behalf of Bermondsey Yards	
GLA Mayor of London	
Shiva Ltd	
Eileen Conn	
Camberwell Society	
Sarah Vaughan	
Ralph Smyth	
Judi Boss	
Paula Orr	
Old Bermondsey Neighbourhood Forum	
Richard Lee	
DP9 on behalf of British Land	
Port of London Authority	
Quod on behalf of Avanton Limited	

**Appendix 2 Consultation Responses and Officer's Responses**

Representation	Officer Response
<p>Individual Anna Roache</p> <p>Key Theme: Southwark Spine</p> <ul style="list-style-type: none"> <li>A cycle route through Burgess Park would be dangerous for pedestrians</li> </ul> <p>Key Theme: NSP33</p> <ul style="list-style-type: none"> <li>Welcome a new rail station here, retention of bus garage and broad aims for housing (affordable and social rented), active frontages. Site should offer enhanced green spaces. Tall buildings should not play a part in this site.</li> </ul>	<p>The Cycle Strategy 2015 provided an indicative and illustrative map for the Southwark Spine that allows the route to be updated and developed “wherever possible”. This allows the council to respond to new opportunities, for example from new developments.</p> <p>Support for policy noted. The priority for NSP33 will be to provide health and research facilities. Tall buildings will be guided by policy P16.</p>
<p>Individual Antonio Lorenzo</p> <p>Key Theme: Cycling Routes and consultation</p> <ul style="list-style-type: none"> <li>Get rid of all cycling schemes and road closures</li> <li>Modifications are hidden from ordinary people, consultations are secretive and overly complicated</li> </ul>	<p>Improvements to cycling infrastructure and diversifying the modes of travel in the borough are in line with the council’s Movement Plan and aim to promote more sustainable transport options.</p> <p>Consultation on the main modifications was carried out in accordance with the regulations.</p>
<p>Berkeley Capital Key theme: NSP41 Newington Triangle</p> <ul style="list-style-type: none"> <li>Welcome and support the change to ‘minimum’ residential capacity in the site and other proposed</li> </ul>	<p>NSP41 – The SCG agreed the existing uses to be 129.1sqm for the car point vehicle hire, this has been updated in the Plan</p>

Representation	Officer Response
<p>changes as agreed in the Statement of Common Ground.</p> <ul style="list-style-type: none"> <li>Note factual changes required to the existing uses on the site.</li> <li>Request review of NSP41 site allocation diagram as amended to review amendment to Conservation Area and borough views location.</li> </ul> <p>Key theme: NSP71 Aylesham Centre and Peckham Bus Station</p> <ul style="list-style-type: none"> <li>Do not support the change from an indicative capacity of 850 homes to a minimum capacity of 700 homes. The reduction of 150 homes has not been justified. The site allocation should be updated to 'minimum residential capacity: 850 homes' and the Housing Trajectory should be updated accordingly.</li> <li>Note that the ability to deliver north-south links that connect to Peckham High Street are very limited, they request that flexibility is applied to this policy requirement due to the constraints and that the potential can be explored.</li> <li>Do not support the 'must' requirement for development to provide new intermediate affordable housing through a community land trust, request that this is moved to the 'may' section or text is added to state redevelopment must investigate the potential for delivery of new intermediate housing through a community land trust.</li> <li>Do not consider the approach to tall buildings element of the site allocation to be justified, request removal of a reference to building height.</li> </ul> <p>Key theme: Policy P14 residential design</p>	<p>accordingly. There has been no other change to the site allocation diagram which was consulted on in August 2020 and is available in the CPC version of the NSP (August 2020). This was an Additional Modification which included all previous updates that had been made to the plan.</p> <p>NSP71 - there is a clearly designed strategy for the capacities of Site Allocations within the NSP as set out within Site Allocations Methodology Paper Update (April 2021, EIP82a). This sets out an indicative capacity of 850 homes. The IIA sets out a minimum capacity of 400 homes. 850 homes is an indicative capacity that could be achieved through detailed-design consideration through the development management process. Through the Main Modifications the Inspectors requested that an indicative residential capacity of 850 homes is in the site allocation, therefore this has been amended from a minimum residential capacity of 700 homes. This is set out in the Inspector's Report at Paragraph 179.</p> <p>Redevelopment should maximise the opportunity to improve links across the site, if this cannot be achieved it will need to be justified.</p> <p>We consider the Community Land Trust to be a positive organisation which will be set up and run by ordinary people to develop and manage homes. They act as long term stewards of housing, ensuring that they remain genuinely affordable based on how much people earn for their area for every future occupier.</p> <p>The capacity and taller building opportunities for this site are informed by a number of spatial considerations including townscape and heritage considerations, prevailing and contextual buildings</p>

Representation	Officer Response
<ul style="list-style-type: none"> <li>Request the requirement for child play space to be provided on ground floor or low level podium is more flexible allowing alternative locations to be considered based on site specific circumstances, as part of a wider play space strategy.</li> </ul> <p>Key theme: Policy P29 office and business development</p> <ul style="list-style-type: none"> <li>Request flexibility on the requirement that employment uses required by this policy being secured by a condition, state that this should be considered on a site by site basis, it is requested that the 'will' is changed to 'may'.</li> </ul>	<p>heights in and around the site, opportunities for new public realm and routes through the site, regeneration opportunities, and the Borough View from One Tree Hill.</p> <p>Policy P14 - Noted. Play space should be accessible for all and by being at ground or low level child play space is more accessible and safer for users. There is a need in the borough for the provision of open space and children's play space, this policy is designed to address and meet this need.</p> <p>Policy P29 – It is important that where employment uses are required as part of the policy, that employment uses are then appropriately conditioned for that use in a planning application. This is also important to demonstrate that planning applications are delivering on the targets outlined in Policy SP1a.</p>
<p>Camberwell Society NSPPSV365</p> <p>P14 Residential Design</p> <ul style="list-style-type: none"> <li>Critical of vague and imprecise definition of tall buildings</li> <li>Lack of differentiation between new build development and period conversions</li> <li>London Plan Policy D6 Housing Quality and Standards should be the foundation for residential design</li> </ul> <p>P16 Tall Buildings</p> <ul style="list-style-type: none"> <li>Welcomes added clarity added by critical of imprecision of taller buildings definition</li> <li>Confusion over what is tall and what is taller</li> <li>Should add 'context height ratio'</li> </ul>	<p>P16 Tall Buildings defines tall buildings and taller buildings to define this stepped down approach to the delivery of tall buildings in suitable locations, where it does not harm the character and context of the local area. The definitions are designed to guide development, and provide additional guidance for the sensitive delivery of tall buildings.</p> <p>The GLA has not raised any compliance issues with the London Plan with regards to design.</p>

<b>Representation</b>	<b>Officer Response</b>
<p>P17 Efficient Use of Land</p> <ul style="list-style-type: none"> <li>• Critical of the approach to optimisation of land, as it is unclear what this means</li> <li>• Concerns P16 and P17 adds complexity to the workload and complexity of assessing forthcoming applications in Camberwell</li> </ul> <p>Heritage Policies (P18,19,20 and 25)</p> <ul style="list-style-type: none"> <li>• Critical of approach taken to preserve or enhance as it takes approach of proactive enhancement and not avoidance of harm</li> </ul>	<p>The taller buildings definition is designed to be flexibly applied to different contexts to ensure that tall buildings development is sensitive to the local context and character.</p> <p>P17 Efficient Use of Land ensures the land uses are most appropriate in that location and context to ensure land is used efficiently.</p> <p>The Heritage policies are designed to protect and enhance local assets both listed and unlisted and ensure development is sensitive to the local context and character.</p>
<p>Catriona Sinclair, Friends of Burgess Park NSPPSV353</p> <p>Key Theme: Southwark Spine</p> <ul style="list-style-type: none"> <li>• Southwark Spine modification is not positively prepared, justified or effective. Despite a consultation in 2015 to have route via Wells Way the maps show it going through the park. No proper consultation on this route</li> </ul> <p>Key Theme: Policy SP2</p> <ul style="list-style-type: none"> <li>• It is not effective to remove number 5 which ensures that buildings relate to the public realm in various ways to link with existing communities. Providing the opportunity for street trees is vital as London adapts to climate warming and combats urban heat island effects. "Analysis across 11 UK city regions estimated the benefits of urban greening was nearly £300 million in a single year for these regions alone, through avoided productivity losses and reduced</li> </ul>	<p>The Cycle Strategy 2015 provided an indicative and illustrative map for the Southwark Spine that allows the route to be updated and developed "wherever possible". This allows the council to respond to new opportunities, for example from new developments.</p> <p>The role of trees in adapting to climate change and global warming has been referenced in P60 Trees and P59 Biodiversity. Both of these policies will be reviewed in the NSP Early Review.</p> <p>SINC sites have been newly designated in the NSP and this protects spaces with biodiversity and a range of species and habitats. If development of a council estate is proposing a loss of amenity land this will need to be considered through the planning application process.</p>

Representation	Officer Response
<p>cooling costs." Assessment of Climate Risk by the Climate Change Committee 2021 Advice to Government.</p> <p>Key Theme: Policy SP6</p> <ul style="list-style-type: none"> <li>• "to address overheating in new and refurbished homes passive cooling measures like better shading, reflective surfaces and green cover" are essential. ..it being one of the top risks in all UK climate risk assessments published to date." Climate Change Committee June 2021 Advice to Government, Assessment of UK Climate Risk</li> </ul> <p>Key theme: Policy P55 protection of amenity</p> <ul style="list-style-type: none"> <li>• Council estates should not be losing green space and trees if resources are to be shared equitably</li> </ul>	
<p>Daniel Watney on behalf of P Wilkinson Containers Ltd (site owners on NSP65 – Verney Road)</p> <p>Policy P16 (Tall buildings) - Reference to the stations and crossings strategy in the Old Kent Road AAP should be removed in the NSP as this has not been examined yet. In accordance with Policy D9 in the London Plan, the policy identifies areas suitable for tall buildings including Old Kent Road, however the specific reference to the AAP plan should be removed as specific heights may change.</p> <p>Policy P32 (business relocation) - The main modifications to this policy are strongly supported.</p>	<p>The stations and crossings strategy is only referred to in the reasons of the policy rather than the policy wording itself. The heights plan is not included in the NSP and will be subject to further consultation in the AAP. Along with the evidence base background paper this justifies the principles of the approach to tall buildings in the Old Kent Road area.</p> <p>Noted.</p>

<b>Representation</b>	<b>Officer Response</b>
<p>More detailed representations have been attached in response to the latest OKR AAP consultation including high level viability information.</p>	
<p>DP9 on behalf of Art Invest Real Estate ('AIRE)</p> <p>Key Theme: NSP77 Decathlon Site and Mulberry Business Park</p> <ul style="list-style-type: none"> <li>• The Main Modifications proposed to Site Allocation NSP77 do not take forward the changes proposed through our SoCG, whereby the indicative residential capacity remains unchanged at 1,371. However, we do recognise the reallocation of housing from a 'must' to a 'should' use and support this modification as recognition of our client's intention to bring forward a commercial development on the site.</li> <li>• Capacity of site should be reduced to 575 and add reference to the additional planning applications for the redevelopment of the site submitted in July 2021</li> </ul>	<p>As set out in the SoCG the Council would not object to reducing the housing capacity on this site if the Inspector required this amendment. The Inspectors have confirmed in their Inspector's Report (Paragraph 187) that it is not necessary for soundness to amend or reduce the residential capacity figure and therefore it remains as 1,371.</p>
<p>DP9 on behalf of British Land NSPPSV27</p> <p>Key Theme: NSP07 (Land between Great Suffolk Street and Glasshill Street)</p> <ul style="list-style-type: none"> <li>• Requests existing uses to be updated to include car park and data centre</li> <li>• Requests removal of 50% of the development to be employment floorspace</li> <li>• Requests removal of active frontages next to the Low Line</li> </ul>	<p>NSP07 Land between Great Suffolk Street and Glasshill Street</p> <p>The Inspector's Report at Paragraph 129 sets out that 'we are mindful that circumstances evolve and will have changed during the course of this examination, both in terms of existing uses and planning applications (including undetermined applications at the time of this report) on proposed allocated sites. Rather than</p>

<b>Representation</b>	<b>Officer Response</b>
<ul style="list-style-type: none"> <li>• Requests addition of hotel use to be listed as an acceptable use on the site</li> </ul> <p>Key Theme: NSP79 (Croft Street Depot)</p> <ul style="list-style-type: none"> <li>• Requests the existing uses to be amended to specify it is a data centre and not employment use classes and the existing uses overestimate the amount of sqm that exist on the site</li> <li>• Requests that the policy refers to non-employment generating uses rather than employment uses in the re-provision as the current use is not an employment use.</li> </ul>	<p>continually refine and amend the Plan, delaying further its adoption, we have drawn a line after those proposed modifications outlined above in terms of what is necessary for soundness. Any further site-specific evidence on existing uses and planning status would need to be considered as a potential material consideration by decision makers'. The plan has therefore not been updated.</p> <p>Evidence was given at the EIP relating to the 50% requirement for employment uses on CAZ sites, active frontages to support the Low Line and that there is not a strategic requirement to allocate more sites for hotels.</p> <p>NSP79 Croft Street Depot</p> <p>The Inspector's Report at Paragraph 129 sets out that 'we are mindful that circumstances evolve and will have changed during the course of this examination, both in terms of existing uses and planning applications (including undetermined applications at the time of this report) on proposed allocated sites. Rather than continually refine and amend the Plan, delaying further its adoption, we have drawn a line after those proposed modifications outlined above in terms of what is necessary for soundness. Any further site-specific evidence on existing uses and planning status would need to be considered as a potential material consideration by decision makers'. The plan has therefore not been updated.</p>
<p>DP9 on behalf of Guys St Thomas Foundation NSPPSV76</p> <p>Key theme: NSP49 London Bridge Health Cluster</p>	

<b>Representation</b>	<b>Officer Response</b>
<ul style="list-style-type: none"> <li>• Applicant supports the allocation of the cluster – boundary, uses etc</li> <li>• Supports provision of ancillary uses</li> <li>• Supportive of 0 residential capacity as aligns with goals of the site</li> <li>• Critical of lack of guidance on scale of development</li> <li>• Critical that the guidance is not clearer that the site is suitable for tall buildings.</li> </ul> <p>Key theme: P16 Tall Buildings</p> <ul style="list-style-type: none"> <li>• Agrees that Guy’s Hospital is a focal point in London Bridge</li> <li>• Foundation raises no significant issues with Tall Buildings definition</li> <li>• Critical of the taller building definition – as confusing that on site allocations with taller buildings tall buildings may not be appropriate – this should be removed</li> <li>• Point for landmark significance should incorporate greater flexibility to account for varying contexts</li> </ul>	<p>The scale of development in NSP49 must compliment the surrounding scale, massing and densities. In terms of development, development heights should step down from the Shard to ensure that the Shard remains a landmark. The site lies within the proximity of listed buildings and conservation areas, and within protected Borough Views and views protected in the London View Management Framework, and therefore tall buildings could be included, providing these views are protected.</p> <p>P16 Tall Buildings defines tall buildings and taller buildings to define this stepped down approach to the delivery of tall buildings in suitable locations, where it does not harm the character and context of the local area. The definitions are designed to guide development, and provide additional guidance for the sensitive delivery of tall buildings.</p>
<p>DP9 on behalf Peachtree Services NSPPSV138</p> <p>Key theme: NSP22: Burgess Business Park (and Policy P29 Office and Business Development and IP3 Community infrastructure levy (CIL) and Section 106 planning obligations)</p> <ul style="list-style-type: none"> <li>• It is for the Inspectors to propose main modifications that make the plan sound and give reasons for those modifications.</li> </ul>	<p>As directed by the Inspectors through Main Modifications, Policy IP3 has been amended to address site specific viability as required. The Inspector’s report at Paragraph 141 confirms:</p>

Representation	Officer Response
<ul style="list-style-type: none"> <li>• There has been no modification to either NSP22 or Policy P29 which would address the point of viability and therefore deliverability on the NSP22 site which was put forward in evidence to the EIP. The council has not done site specific viability testing as part of the plan for this site. The site allocation NSP22 cannot be found sound due as the site requirements cannot be met due to viability and is therefore undeliverable.</li> <li>• The modification to Policy IP3 which the council have put forward in response to the discussion at the EIP is not sufficiently clear. Additional wording has been proposed to refer to land use requirements specifically in site allocations under the ‘must’ and ‘should’ headings</li> </ul>	<p>It is not ‘necessary for soundness to recommend a specific viability clause within the policy for NSP22 Given the plan-wide viability evidence, there will be similarly marginal sites, and so we consider the issue is more appropriately addressed through the Plan’s over-arching policy on the approach to planning obligations’.</p> <p>The Inspector’s Report also proposes further amendments to IP3 at Paragraph 141 to provide clarify in the policy that the term ‘policy requirements’ would include the ‘must’ and ‘should’ requirements set out in the individual site allocation policies. They also consider it necessary to clarify in the supporting text to Policy IP3 that whilst the plan-wide viability evidence meets the requirements of national policy, it does not demonstrate that each and every site allocation would be necessarily viable. IP3 has been amended accordingly.</p>
<p>Individual Eileen Conn NSPPSV56</p> <p>Key theme: Rescinding of the PNAAP and other AAPs with the NSP</p> <ul style="list-style-type: none"> <li>• Raise that the proposal has not been subject to consultation before these Main Modifications. In the short time allowed for this MM consultation there has not been sufficient time to consider adequately the impact of the proposals for the PNAAP and whether the aspects transferred to the NSP are equivalent and do not lose important aspects of adopted policy.</li> <li>• Unclear what windfall sites mean where they are not transferred into NSP.</li> </ul>	<p>Noted. The justification of rescinding the AAPs is set out in EIP211 it confirms that reviews of all of the policies in the AAPs took place and they have been replaced in the NSP with more up to date policies. Consultation has taken place on these policies and they are going through examination.</p> <p>Reviews of all of the sites in the AAPs took place, the Council set out the current status of each site in the AAPs to decide which sites should be taken forward in the NSP. The Council removed all of the sites that are being built or that were completed from the list to take forward to the NSP. All of the other sites that were in the AAPs have</p>

**Representation**

- An example is site PNAAP2 Print Village Industrial Estate, Chadwick Road. This is not being transferred to the NSP because “This site has not been developed, it can come forward as windfall”. But the PNAAP has a significant condition to any development proposals for this site. This is in the Site Specific Guidance “redevelopment of this site must not result in the net loss of business space (Class B).” This was inserted into the PNAAP as a protection from development because the site works very well as an industrial site and fits well with the surrounding residential area. Removing this protection would significantly and without justification change the policy.
- There are still references to the PNAAP in the NSP. For example in MM160 “... height restriction on development proposals should be observed to conform with guidance set out in the Peckham and Nunhead Area Action Plan...” Query on soundness if this is to be rescinded.

Key theme: Boundaries of the two linked open spaces – Peckham Rye Common and Peckham Rye Park

- Query regarding the name of land on the maps is still Peckham Rye Park instead of Peckham Rye Common.

**Policy SP2**

- Comments on title change – retain title but welcomes Southwark Stands Together link
- Welcomes the inclusion of ‘local businesses’ as an explicitly referenced local stakeholder.
- Agrees with climate emergency inclusion but should be ‘development approaches’

**Officer Response**

been included in the NSP. The Council then consulted on these sites and they are being examined. The exception is the detail on the core area for the Aylesbury AAP, the proposed main modification is set out in EIP 202a.

Windfall sites are defined in the NPPF as ‘sites not specifically identified in the development plan’. This is also reiterated in the 5 and 15 Year Housing Land Supply Report. A number of the sites from AAPs have not been included as they are smaller sites which come forward being assessed against the development management policies in the plan.

The reference to PNAAP in MM160 has been removed.

The map has been updated to reference Peckham Rye Common.

Support noted. The edits made to the policy are to reflect the Southwark Stands Together commitment and wider changes to approaches in growth and development in the borough. Social infrastructure encompasses both community and health infrastructure

Representation	Officer Response
<ul style="list-style-type: none"> <li>• Policy wording should be more explicit in prescribing the 'gating' of community amenities delivered as part of development</li> <li>• Expand on definition of social infrastructure</li> <li>• Point 5 should be retained relating to frontages and permeability</li> <li>• Agree with Southwark Stands Together Inclusion</li> <li>• Change the list of those with protected characteristics to reflect the list in the Equality Act 2010.</li> <li>• Welcome changes elsewhere in the plan to recognise the needs of Southwark's Gypsy and Traveller Communities, express reference to 'ethnicity' here would also be welcome.</li> <li>• Point 7 – included designed and / or retrofitted – to ensure retrofitting is prompted too</li> <li>• Point 8 suggestion - '...above shops, in ways that do not compromise overall high-street depth, to enliven town centres without compromising their adaptability to business growth and evolution' - to reflect comments made in EIP'</li> <li>• Point 9 – Council should set out what is meant by 'collaboration', 'participation' and 'consultation'</li> <li>• Point 10 – should refer to social and community infrastructure</li> <li>• Generally supportive of the reasons</li> </ul>	
<p>Individual Eleanor Massey</p> <p>Key Theme: Southwark Spine</p>	

<b>Representation</b>	<b>Officer Response</b>
<ul style="list-style-type: none"> <li>Southwark Spine modification is not positively prepare, justified or effective. Despite a consultation in 2015 to have route via Wells Way the maps show it going through the park. No proper consultation on this route</li> </ul>	<p>The Cycle Strategy 2015 provided an indicative and illustrative map for the Southwark Spine that allows the route to be updated and developed “wherever possible”. This allows the council to respond to new opportunities, for example from new developments.</p>
<p>Gerald Eve on behalf of Landsec (NSP – Red Court)</p> <p>Policy P30 (affordable workspace):</p> <ul style="list-style-type: none"> <li>Replace ‘gross’ with ‘net new’ in the policy for the affordable workspace requirement because requiring affordable workspace on extensions or redevelopment schemes could undermine viability.</li> <li>Supports the flexibility of the policy in terms of other allowing other uses such as retail or cultural uses (part 5) however thinks the reference to ‘only in exceptional circumstances’ should be removed to allow more flexibility.</li> <li>As such the restriction on use Class E should also be removed in reference to conditions – the affordable workspace occupier definition includes uses which fall outside Class E.</li> </ul> <p>Policy P21 (Borough views): Support the change in wording</p> <p>NSP05 (1 Southwark Bridge Road and Red Lion Court):</p> <ul style="list-style-type: none"> <li>Financial Times building (1 Southwark Bridge Road) is a separate land owner to Red Lion Court and has permission for office extension and refurbishment. Concern that if comprehensive development is not secured across the whole site, it would be difficult to deliver residential</li> </ul>	<p>The updated wording to the reasons of the affordable workspace policy clarifies the circumstances in which the policy applies; to extensions over 500sqm and new developments (regardless of any floorspace that will be demolished) or changes of use over 500sqm. This has been justified in evidence given in the EIP and through additional viability evidence. The need for affordable workspace is for employment uses as demonstrated in our evidence base needs report. There is a clause allowing for alternatives such as retail or cultural uses but this is only with a demonstrated need and named occupier, so it is correct that the policy should remain applying only to exceptional circumstances. The use of conditions for use class E is necessary because the need for affordable workspace is in classes E(g) specifically.</p> <p>The land ownership and planning application circumstances of the site is noted. The approach to ‘must’ and ‘should’ definitions is included in the plan. Whilst housing is strongly encouraged on the site, in the CAZ housing should be provided in mixed use schemes where a re-provision or uplift in employment uses can be secured. It is considered there is sufficient flexibility in the</p>

Representation	Officer Response
<p>development. Therefore request the requirement to provide housing in the site allocation is changed from a 'should' to a 'may' requirement.</p>	<p>policy to account for changing circumstances if comprehensive development of the site cannot be achieved.</p>
<p>GLA Mayor of London NSPPSV66</p> <p>Greater London Authority on behalf of the Mayor of London has submitted a response, they have fully considered the proposed main modifications and is of the opinion that the draft Local Plan is in general conformity with the London Plan 2021 (LP2021).</p> <p>The Mayor supports many of the modifications to the plan. Key points:</p> <p>Key Theme: Policy P1 social rented and intermediate homes:</p> <ul style="list-style-type: none"> <li>• Notes the fast track approach is higher than the LP2021, would be useful if the draft Plan could include references to relevant evidence to support the proposed approach.</li> <li>• The policy should also reflect that part of the Mayor's approach which sets the affordable housing threshold at 50% on publicly owned land and on industrial land, where residential proposals would result in a loss of industrial capacity. This too should be included in the amendments to Policy P1 for it to be consistent with the LP2021.</li> </ul> <p>Key Theme: Policy P5 student homes:</p>	<p>Policy P1 – the reasons for the policy set out the need for social rented and intermediate housing in the borough which justifies the higher fast track threshold. The policy references the Mayor's approach for development on public sector land.</p> <p>The Mayor's approach on industrial land is not viable and therefore is not included in the policy. The Old Kent Road Opportunity Area Viability Study (April 2016) prepared by BNP Paribas Real Estate on behalf of Southwark considers the viability of meeting planning policy requirements as set out in the New Southwark Plan and the Old Kent Road Area Action Plan for development in the Old Kent Road opportunity area.</p> <p>The testing confirms that the Council's policy requirement of 35% affordable housing is acceptable. In some instances, subject to their benchmark land value and grant funding available, sites can achieve higher provisions of affordable housing (45% affordable housing). The study also confirms that some schemes have challenging viability. Although some sites can deliver 45% affordable housing, industrial sites can incur exceptional costs which can be an issue for development viability. Our flexible approach to affordable housing in the Borough (including Old Kent Road action area) ensures full consideration can be given to the viability of redeveloping sites.</p>

**Representation**

- The Mayor is disappointed that the objection raised in his earlier response in October 2020, regarding the provision of affordable student accommodation, has not been addressed as part of the proposed amendments.
- LB Southwark should note that where proposals for purpose-built student accommodation do not secure at least 35% of the accommodation as affordable student accommodation (50% on publicly owned land or industrial land where there would be a loss of industrial capacity), those proposals will be required to follow the Viability Tested Route (VTR) and will be subjected to viability review mechanisms in accordance with Policies H15 and H5 of the LP2021.

Key Theme: Policy P16 tall buildings:

- The Mayor notes and welcomes the Tall Buildings Zone which is clearly illustrated on maps and the numerical part of the tall building definition included in the fact box as part of the proposed amendments. Certainty should be provided in terms of identifying those areas where tall buildings are considered to be acceptable and appropriate/maximum building heights or ranges of heights could be set out clearly within the site allocations or in maps.

Key Theme: Site Allocations:

- The Mayor considers 6 site allocations which are currently sites which contain some light industrial or warehousing uses but are not on existing or proposed designated industrial land should require provision of industrial uses specifically (Use Class E(g)(iii) or B8)

**Officer Response**

It is unviable to set a threshold approach of 50% affordable housing on Strategic Industrial Locations, Locally Significant Industrial Sites and Non Designated Industrial Sites appropriate for residential uses where the scheme would result in a net loss of industrial capacity. Expecting 50% affordable housing to be provided on industrial land, particularly on Old Kent Road may have significant consequences on the viability of schemes coming forward, and as such, this requirement is not applied in Policy P1. If a planning application is submitted that is referable to the Mayor of London and is on industrial land, the application of the fast track approach on industrial land will need to be considered by the Greater London Authority and whether this is applied as per the London Plan Policy H5.

Policy P5 – Noted. Given the significant need for affordable housing in the borough we require the provision of affordable homes and affordable student rooms on direct let student schemes subject to viability. This is justified further in the student housing background paper (SP103). The fast track route is not proposed in Policy P5.

Policy P16 – Noted. It is considered the Tall Building Zone mapping and tall building definition are clear and unambiguous. The site allocations also contain information on the approach to tall buildings. In the future, the council may prepare further design guidance on the site allocations, and further detail on buildings heights could be considered at this stage. London View Management Framework (LVMF) views are included on the council’s interactive mapping service on the council website. Acknowledgement of the LVMF views within part 2 of P16 will signpost to the applicant to check for these policy designations.

<b>Representation</b>	<b>Officer Response</b>
<p>otherwise existing industrial capacity could be lost to office or other uses.</p>	<p>Site allocations – Some of the site allocations which were raised in the representation are sites which currently have industrial uses as part of the existing uses or are non-designated industrial sites. The London Plan Policy E7 (C.2) states that mixed use or residential proposals on non-designated industrial sites should only be supported where it has been allocated in an adopted DPD for residential or mixed use development. The NSP approach to non-designated industrial sites is set out in the Industrial Background Paper and evidence was given at the EIP. The provision of employment uses in the sites has been updated to reflect the new use classes (E(g) and B class) so wider Class E uses are not accepted as replacement employment uses. Policy P29 has been updated with specifying that the council will use conditions to restrict the change of use within Class E. Policy P29 also works in conjunction with the site allocation policies which requires a marketing strategy for the use and occupation of the employment space to be delivered to demonstrate how it will meet current market demand. The council’s evidence including the affordable workspace map in the NSP shows the demand for workspace in different parts of the borough. Office uses are unlikely to be accepted on site allocations where there is no demand for this use, particularly on the site allocations outside the CAZ and town centres, and industrial uses will be conditioned as necessary to continue to meet market demand.</p>
<p>Individual James Coldwell</p> <p>Key Theme: Equalities and evidence base</p>	<p>The IIA and EQIA are based on the most up to date evidence that the council has.</p>

<b>Representation</b>	<b>Officer Response</b>
<ul style="list-style-type: none"> <li>Concern raised regarding equalities impacts of the impact assessments of the plan using 2011 census data and cycling</li> </ul>	<p>The EQIA has assessed the impact of the cycling policies on people with protected characteristics</p>
<p>Individual Jean Rogers</p> <p>Key Theme: Southwark Spine</p> <ul style="list-style-type: none"> <li>The spine route should not go through Burgess Park. The park is heavily used by pedestrians and this route would be dangerous</li> </ul>	<p>The Cycle Strategy 2015 provided an indicative and illustrative map for the Southwark Spine that allows the route to be updated and developed “wherever possible”. This allows the council to respond to new opportunities, for example from new developments.</p>
<p>Jerry Flynn (Jerry Flynn 35% campaign, Stephen Lancashire)</p> <p>Key Theme: Policy SP1b, Table 1B, Housing Trajectory</p> <ul style="list-style-type: none"> <li>Throughout the Examination process, the provision of employment floorspace in Table 1B has substantially increased from 217,882 net sqm to either 468,321 net sqm or 704,369 net sqm, depending on the amount built on the Canada Water Masterplan site, both of which exceed the 460,000 sqm target.</li> <li>In particular the amount to be delivered at the Elephant and Castle has increased from minus 1,563 net sqm to plus 84,658 net sqm. 60,000 net sqm of this will be on the Elephant Park site Plot H1, the site of a planning application for an office block by Lend Lease. Southwark claim that this will not replace any other uses on the overall masterplan for the site but this is not accurate. Lend Lease holds a planning</li> </ul>	<p>The council needs to demonstrate how the employment targets responding to an identified need will be met in the borough. Throughout the Examination process, the employment figures in Table 1B to meet the identified targets have increased. This is due to updated information about planning applications and approvals and an updated masterplan for the Old Kent Road AAP. Whilst the site allocations will go some way to meeting the employment targets, Table 1B and the site allocations methodology paper also identifies areas of the borough where office provision may increase, for example through approved or proposed planning applications outside the NSP site allocations. These have been recorded separately. The target for office floorspace is 460,000sqm over the plan period, however the plan also contains a target for other types</p>

<b>Representation</b>	<b>Officer Response</b>
<p>consent for this plot for residential development. This substantial modification represents a significant change of land use, and does not involve a diverse range of people about the priorities of competing land uses.</p> <ul style="list-style-type: none"> <li>• Requests deletion of reference to 60,000sqm offices in Elephant Park from Table 1B and add housing for this plot to the housing trajectory.</li> </ul>	<p>of employment floorspace (e.g. industrial) of 90,000sqm net increase over the plan period bringing the total to 550,000sqm. The employment figures in Table 1B include all types of employment uses. In relation to Plot H1 the background document stated that the proposal for office uses on the site would not replace any housing development that has already been accounted for in the housing supply pipeline.</p>
<p>Individual Judi Boss NSPPSV375</p> <p>Key theme: Aylesbury Area Action Plan and estate redevelopment</p> <ul style="list-style-type: none"> <li>• Concern raised regarding the rescinding of the Aylesbury Area Action Plan without residents being fully consulted.</li> <li>• The NSP has failed to contact residents on the Aylesbury Estate and assess the impacts of the delayed scheme and provide details of the impacts of the protected characteristics.</li> <li>• Concern raised regarding the delivery of affordable homes at the Aylesbury Estate including the fast track route included within Policy P1.</li> <li>• Concerns raised over the introduction of the space standards from the Aylesbury Action Plan as some of the requirements are lower than the London Plan 2021, as they are broken down by number of storeys.</li> <li>• Concerns raised over the Equalities Impact Assessment, stating consideration has not been given to all</li> </ul>	<p>Detailed justification for rescinding the Aylesbury Area Action Plan is set out in EIP202a Aylesbury Background Paper Update. The amendments set out are necessary for soundness of the New Southwark Plan (Paragraph 35 of the National Planning Policy Framework), in particular effectiveness to include the allocation and relevant policies from the Aylesbury Area Action Plan in the New Southwark Plan to provide certainty on development coming forward in the Aylesbury Area Action Core instead of the different policy requirements being set out in two documents which may lead to confusion if some standards for housing and parking a different in both documents. In addition, it is necessary to ensure the Plan is positively prepared as the development coming forward in the Aylesbury Action Area Core includes significant delivery of new homes in the borough and therefore will contribute to meeting the borough's housing requirement. The Aylesbury AAP will be presented to Cabinet to set out that it should be rescinded on adoption of the NSP. Where required, the AAP policies have been carried forward into the NSP. With regards to the space standards,</p>

<b>Representation</b>	<b>Officer Response</b>
<p>people with protected characteristics and consultation has not taken place.</p> <ul style="list-style-type: none"> <li>• Concern raised over the guidance on tall buildings as no maps showing the location of tall buildings are provided.</li> </ul>	<p>the Aylesbury Action Area Core space standards are set as net internal area and would have a higher gross internal area, whereas within the London Plan 2021 the space standards are set as gross internal area and therefore they cannot be directly compared. Where development is coming forward consideration will be given to the London Plan policies.</p> <p>Our website provides updates on the status of development on the estate and residents will be consulted with on the redevelopment as required. The new homes are being built with our development partner, Notting Hill Genesis housing association (NHG). Some of the first new homes to be built will be council homes; managed and rented by Southwark Council. Others will be mixed tenure homes (social rent, shared ownership) which will be managed by NHG and some will be homes to own outright. The new homes will also include specialist housing for older people and for people with learning difficulties.</p> <p>The EQIA has considered people with protected characteristics and assessed the potential impact on them through the redevelopment of the Aylesbury Estate. It also considers all of the policies within the plan which through redevelopment may impact upon people with protected characteristics. The IIA also considers the potential social, environmental and economic impacts of the policies and site allocations and sets out how impacts can be mitigated as needed.</p> <p>NSP01a sets out the consideration for tall buildings on the site and Policy P14 of the Plan sets out the consideration for locating tall buildings.</p>
Individual	

Representation	Officer Response
<p>Liam Hennessy NSPPSV380</p> <p>Theme: Tall Buildings</p> <ul style="list-style-type: none"> <li>• The 15 storey tower on Plot 18 at the end of Aylesbury Road is causing harm to the Liverpool Grove Conservation Area</li> <li>• Burgess Park is harmed by a 10 storey tower 21-23 Oarkhouse which will overshadow a SINC</li> <li>• Burgess Park is harmed by a 20 sotrey tower on the First Development Site of Aylesbury</li> <li>• The council is harming Liverpool grove Conservation Area and Burgess Park</li> <li>• Bad planning at Parkhouse Street and Wickway Centre with overshadowing of a SINC</li> <li>• The amenity value of Burgess Park is being diminished</li> <li>• The 22 storey building proposed by Southwark Charities will overshadow the historic garden at Hopton's Almshouses - blocking sunlight at certain times of the year.</li> <li>• The 22 storey building proposed by Southwark Charities will overshadow the historic garden at Hopton's Almshouses - blocking sunlight at certain times of the year.</li> </ul> <p>Theme: Housing delivery</p> <ul style="list-style-type: none"> <li>• The GLA's AMR shows a pipeline of –680 social rented homes, the second worse pipeline for any London Borough</li> </ul> <p>Theme: Area Visions</p> <ul style="list-style-type: none"> <li>• Should be called 'Lack of Vision'</li> </ul>	<p>Development around conservation areas is guided by Policy P19 (Conservation Areas), development near SINC's is guided by Policy P59 (Biodiversity)</p> <p>With regards to Burgess Park, as Metropolitan Open Land, development surrounding Burgess Park is guided by Policy P56 (open space), an overarching policy covering all open space in the borough.</p> <p>Housing delivery: Southwark has consistently delivered some of the highest numbers of homes. The delivery of homes delivered through the NSP will be monitored through the indicators in the Monitoring Framework through the Authority Monitoring Report.</p> <p>Masterplanning for Old Kent Road is considered within the emerging Old Kent Road AAP.</p>

Representation	Officer Response
<p>Theme: Old Kent Road</p> <ul style="list-style-type: none"> <li>• Old Kent Road needs to be planned as a tree-lined boulevard, with no more than one lane for cars in each direction, plus a bus lane in each direction.</li> </ul> <p>Theme: General</p> <ul style="list-style-type: none"> <li>• There should be an external investigation into planning at Southwark</li> </ul>	
<p>Individual Luke Blaney</p> <p>Key Theme: P52 Cycling; Climate</p> <ul style="list-style-type: none"> <li>• Strongly support changes to MM65 to strengthen requirements for developers to provide high quality cycle parking</li> <li>• Support increase in required short stay retail cycle parking</li> <li>• Support requirement for major development to be net zero carbon</li> <li>• Support for more references to climate change and net zero carbon targets throughout the plan</li> </ul>	<p>Support noted.</p>
<p>Individuals Marc Hauer and Jenny Topper</p> <p>Key Theme: Southwark Spine</p> <ul style="list-style-type: none"> <li>• Endorse comments made by Susan Crisp on 17 Sept 2021. The cycle route crossing Burgess Park would</li> </ul>	<p>The Cycle Strategy 2015 provided an indicative and illustrative map for the Southwark Spine that allows the route to be updated and</p>

<b>Representation</b>	<b>Officer Response</b>
<p>undermine the principles stated in MM7, paras. 1 and 2, and MM11, paras. 2 and 7.</p> <ul style="list-style-type: none"> <li>• Maps are not consistent, there is a divergence between the aspirational ideas in the Plan and the execution. Disappointing to see the plan in being developed in tandem with TfL</li> </ul>	<p>developed “wherever possible”. This allows the council to respond to new opportunities, for example from new developments.</p>
<p>Individual Marcus Clissold-Lesser</p> <p>Key Theme: Southwark Spine</p> <ul style="list-style-type: none"> <li>• The Southwark Spine modification is not positively prepared, justified or effective . The "Burgess Park" cycle way really should use the surrounding roads rather than cutting up the park.</li> </ul>	<p>The Cycle Strategy 2015 provided an indicative and illustrative map for the Southwark Spine that allows the route to be updated and developed “wherever possible”. This allows the council to respond to new opportunities, for example from new developments.</p>
<p>Individual Martin Hetherington</p> <p>Key Theme: Southwark Spine</p> <ul style="list-style-type: none"> <li>• A cycle route through Burgess Park is dangerous for pedestrians and birdlife, it should go through Wells Road</li> </ul>	<p>The Cycle Strategy 2015 provided an indicative and illustrative map for the Southwark Spine that allows the route to be updated and developed “wherever possible”. This allows the council to respond to new opportunities, for example from new developments.</p>
<p>Mike Priaulx, Swifts Local Network: Swifts and Planning Group</p> <p>Key Theme: Biodiversity</p>	<p>General support for the policy is noted.</p>

**Representation**

- Generally support this policy but in the following aspect I believe it is not sound, as not consistent with national policy London Plan G6 B (4) "...such as artificial nest sites, that are of particular relevance and benefit in an urban context..." and also not consistent with NPPG 2019 Natural Environment Paragraph 023 reference to "swift bricks", which are not covered by the references to green infrastructure and net biodiversity gain (as the definition and DEFRA metric respectively do not give any value to artificial nest sites).
- Suggests amendments to Reasons text to add in CAPTIALS

"Biodiversity benefits people within and outside Southwark by maintaining ecosystems, providing natural resources, regulating the environment, mitigating and adapting to climate change, and enriching mental health and wellbeing as well as having intrinsic value. Regeneration, particularly in areas of natural deficiency, presents the opportunity to deliver net biodiversity gains benefitting local people by introducing features for wildlife AND green infrastructure.

Due to the intense pressure on land for development, it is important that areas AND FEATURES of nature conservation value or ecological importance are identified and the flora and fauna are protected and enhanced."

**Officer Response**

The GLA have not raised any compliance issues with regards to London Plan G6 B (4). Artificial nest sites are not explicitly referenced in P58 or P59, however the introduction of green infrastructure such as green roofs and nest boxes implicitly include artificial nest sites for birds. The Southwark Nature Action Plan (SNAP) (2020) also provides guidance on appropriate nest sites for priority bird species in Southwark, which includes artificial sites such as building roofs, green roofs, tall buildings and nest boxes.

Swift boxes are included as an example rather than a requirement in NPPG Natural Environment para. 23 and are as such not mentioned explicitly in P58 or P59. Specific interventions for the Southwark context will be identified during the process of introducing 10% mandatory net gain in biodiversity (as mandated by the Environment Bill) in conjunction with early review of the NSP.

Representation	Officer Response
<p>Montagu Evans on behalf of Guys and St Thomas NHS Foundation Trust - Vinegar Yard NSPPSV76</p> <p>Key Theme: NSP51 (Vinegar Yard)</p> <ul style="list-style-type: none"> <li>• Application on the site was refused by LBS but it was called in by the Mayor of London, discussions and updates are now underway with GLA officers</li> <li>• Generally support the changes to the site allocation wording including the change with respect to tall buildings stepping down from west to east and the clarification of sqm of public open space (the policy requires 15%, the scheme provides 51%).</li> <li>• Would prefer bullet point 3 of the allocation to specify medical and health uses (Class E(e)) as whilst these are included in the glossary definition of the modified “retail, leisure or community uses”, this is a weaker location rather than the site allocation wording itself</li> </ul>	<p>Support noted. The definition in the glossary is clear which use classes would be acceptable, including medical and health uses.</p>
<p>Natural England NSPPSV244 No comments</p>	<p>N/A</p>
<p>Old Bermondsey Neighbourhood Forum NSPPSV193</p> <p>Key theme: Process</p> <ul style="list-style-type: none"> <li>• EIP219 – Critical tracked changes were not provided</li> <li>• EIP220 – policies map was not accessible prior to and during examination, policies and tall buildings map are unclear and unhelpful</li> </ul>	<p>The consultation process during the Examination has been led by the Inspectors and Southwark Council has completed this.</p> <p>The Heritage SPD was agreed for adoption by Cabinet in October 2021. This document sets out design guidance for heritage assets.</p>

Representation	Officer Response
<ul style="list-style-type: none"> <li>• Attached SOCG from previous discussions - SOCG was not agreed</li> </ul> <p>Key theme: SP2, P12 Design of Places and P13 Design Quality</p> <ul style="list-style-type: none"> <li>• SP2 – point 5 should be reinstated</li> <li>• There is a need for an Urban Design SPD</li> </ul> <p>Key theme: Bermondsey and London Bridge Area Vision</p> <ul style="list-style-type: none"> <li>• Critical of new boundaries of the area visions and the proposals do not meet local opinion</li> </ul> <p>Key theme: Tall Buildings</p> <ul style="list-style-type: none"> <li>• Alternatives have not been considered and proper consultation on tall buildings areas have not been completed</li> <li>• Definition of tall buildings is not aligned with the London Plan and is unclear</li> </ul> <p>Key theme: Local List</p> <ul style="list-style-type: none"> <li>• The local list criteria are not defined and the Heritage SPD has not been effectively consulted on</li> </ul> <p>Key theme: Site Allocations</p> <ul style="list-style-type: none"> <li>• Site allocations should include the FAR ratio and indicative capacities</li> </ul> <p>Key theme: NSP50 and NSP51</p> <ul style="list-style-type: none"> <li>• SOCG requests not included in the main or additional modifications</li> <li>• FAR ratio and indicative capacity not included</li> </ul>	<p>The new boundaries of Bermondsey and London Bridge Area Visions reflect neighbourhood forum area designations and Business Improvement Districts as well as site allocations.</p> <p>Southwark Council’s approach to tall buildings is consistent with the London Plan. The Tall Buildings approach is designed to ensure tall and taller buildings are delivered in preferred locations in the borough where it is suitable for the local character and context.</p> <p>The Heritage SPD was agreed for adoption by Cabinet in October 2021, it has been subject to public consultation and sets out further criteria on whether the council will add a building to the local list.</p> <p>In terms of the FAR Ratio and Indicative capacities, these are set out in the site allocations methodology update, and the indicative capacities have been requested here by inspectors.</p> <p>In terms of the SOCG, these additions to policies have not been agreed and some edits have been made for factual changes to maps and requirements.</p>

Representation	Officer Response
<p>Key theme: Statement of Common Ground</p> <ul style="list-style-type: none"> <li>• A SOCG was not agreed or signed by either party with OBNF despite a series of meetings and discussions with the group.</li> <li>• The SOCG includes:</li> <li>• Site allocations 50 &amp; 51 – missing FAR ratios and approach to tall buildings and design and accessibility guidance and requirements</li> </ul>	
<p>Individual Paula Orr NSPPSV136</p> <p>Key theme: Environment and Monitoring Framework Strategy and Strategic Targets</p> <ul style="list-style-type: none"> <li>• Point 1 – target is not measurable to just reduce carbon emissions</li> <li>• Point 8 – should just be 2030 target</li> </ul> <p>P59 Biodiversity</p> <ul style="list-style-type: none"> <li>• The policy is not justified and assumes biodiversity is only achieved by urban greening</li> <li>• There is no measurement on offsite contributions in the monitoring framework</li> </ul> <p>P60 Trees</p> <ul style="list-style-type: none"> <li>• Policy is not strong enough on protecting all trees, especially mature ones with greater carbon storage</li> </ul> <p>New Southwark Plan Monitoring Framework</p>	<p>The NSP target has been prepared to work towards achieving net carbon zero target by 2050. The NSP early Review will look to achieve net carbon zero by 2030 through updated and new policy.</p> <p>Under P59 Biodiversity, there is no measurement of offsite contributions in the monitoring framework, but this will be reviewed for inclusion at a later date.</p> <p>P60 Trees sets out a strategy to protect and retain the Borough's trees and requires replacement if removed to facilitate development. Trees are valuable for a number of reasons including carbon storage.</p> <p>The different types of open spaces are defined in the Plan at Policy P56. As set out within the reasons, when new open spaces are completed and open to the public, these will be designated as new open spaces in accordance with the open space designations criteria outlined in the fact box through the plan-making process.</p>

<b>Representation</b>	<b>Officer Response</b>
<ul style="list-style-type: none"> <li>• Indicators for open spaces is not justified – only shows approval and not delivery</li> <li>• Indicators for P12 are not justified – only shows approval and not delivery</li> <li>• Indicators for P14 are not justified – only shows approval and not delivery</li> <li>• Not clear what is counted as open space, the indicators are not clear or justified as does not monitor loss of green space</li> <li>• P58 Green Infrastructure – welcomes monitoring framework additions</li> <li>• P59 Biodiversity – insufficient monitoring – does not include offset obligations</li> <li>• P60 Trees– replacement of trees should not be monitored by canopy cover</li> </ul>	<p>P60 Trees has a number of indicators which indicate the protection of the number of trees and canopy cover.</p>
<p>Planning Potential on behalf of Fitzroy Property Management LLP</p> <p>Key theme: Kent Park Industrial Estate, Ruby Street (NSP65)</p> <ul style="list-style-type: none"> <li>• Supports the higher housing target for the plan period to ensure it addresses the need in the borough and that additional housing should be delivered in the Old Kent Road.</li> <li>• No comments on the boundary change to NSP65.</li> <li>• They welcome the increase in the housing capacity for NSP65.</li> <li>• They note that NSP65 has been amended to align with the London Plan as existing employment, retail and community uses need to be re-provided to at least the existing level, although they note that like for like floorspace</li> </ul>	<p>Noted.</p>

<b>Representation</b>	<b>Officer Response</b>
<p>is not always the most beneficial mechanism to secure the benefits of the non-residential uses and consideration should be given to the design/layout/effectiveness and employment generation, in terms of job creation, when considering whether replacement employment floorspace appropriately reprovdes for that which is lost as part of the development</p>	
<p>Port of London Authority NSPPSV143</p> <p>Theme: Blackfriars Road Area Vision PLA supports main modification MM19 to the Blackfriars Road Area Vision, which sets out that development in Blackfriars road should improve existing and create new cycle and walking routes, including the Thames Path. This is in line with the PLAs Vision for the Tidal Thames (The Thames Vision) (2016) which includes the goal to join up the Thames Path form source to sea, and to see enhancements to access routes to/from the Thames Path.</p> <p>Theme: Policy P26 Furthermore, the PLA welcomes the proposed additional modification AM26 to policy P24 (River Thames) that development within the Thames Policy area must consider the use of the River Thames as an alternative means of transport during construction.</p>	<p>Support noted.</p>
<p>Quod on behalf of Avanton Limited NSPPSV17</p> <p>Key theme: Strategic targets</p>	

Representation	Officer Response
<ul style="list-style-type: none"> <li>Minor amendments suggested to the targets so they can be monitored and are measurable</li> </ul> <p>Key theme: Policy SP1 Homes for all</p> <ul style="list-style-type: none"> <li>Request new council homes delivery figure is adjusted to cover the period up to 2036 and not 2043 to be in line with the plan period</li> <li>Reasons to SP1 set out the significant need for affordable housing in the borough, it is considered that the New Southwark Plan cannot realistically be considered to objectively meet the local authority's housing needs and is therefore not positively prepared. To overcome this issue, the local authority should seek to further increase housing delivery through enhanced optimisation of proposed site allocations, developments in opportunity areas, and strong support for higher density developments across the Borough.</li> </ul> <p>Key theme: Old Kent Road Area Vision</p> <ul style="list-style-type: none"> <li>Support Draft Policy AV.13's intention to provide two district town centres along the Old Kent Road, and request that their respective boundaries are defined on the Old Kent Road Area Vision Map.</li> </ul> <p>Key theme: Policy P1 social rented and intermediate housing</p> <ul style="list-style-type: none"> <li>The affordable housing contribution sought on developments of 9 or less homes does not accord with the NPPG and should be removed.</li> <li>The 40% level also surpasses the fast-track benchmark applied by Policy H5 of the adopted London Plan (2021), which is set at a minimum of 35% for all sites</li> </ul>	<p>Strategic targets – these provide an overview of the targets within the Plan, the detailed targets and indicators are set out in the Strategic Policies and the Monitoring Framework in the Plan.</p> <p>Policy SP1 (homes for all) - the new council homes delivery target is set within the borough plan and covers the period up to 2043, this is a separate target to our overall housing target and cannot be amended.</p> <p>The housing target is based on the borough target in the London Plan which is based on need and capacity London-wide.</p> <p>Old Kent Road – the boundaries are identified on the Area Vision map.</p> <p>Policy P1 (social and intermediate housing) - P1 sets a requirement for the provision of affordable housing on minor schemes and sets a fast track threshold of 40% given the significant need for affordable housing in the borough as identified in the Strategic Housing Market Assessment (2019)(SP107).</p> <p>The factbox clarifies that there is an exception to discount market rent where it states 'unless otherwise stated above'.</p> <p>Policy P2 (new family homes) - support is noted.</p> <p>Policy P14 (residential design) - Play space should be accessible for all and by being at ground or low level child play space is more accessible and safer for users. There is a need in the borough for the provision of open space and children's play space, this policy is designed to address and meet this need.</p>

Representation	Officer Response
<p>that are not on public sector land or allocated industrial sites. Draft Policy P1 is therefore contrary to the London Plan Policy H5 and the targeted level at which a scheme may be progressed through the fast-track route.</p> <ul style="list-style-type: none"> <li>Reason 5 states that “Southwark prioritises London Living Rent, or a Discount Market Rent equivalent to London Living Rent, as an intermediate rent product”. This statement conflicts with the policy Factbox which states that “London Affordable Rent, Affordable Rent and Discount Market Rent are not considered to be affordable and therefore do not fall under social rented and intermediate housing products we accept, unless otherwise stated above”. The above statements therefore conflict and Southwark position regarding the acceptability of Discount Market Rent tenure should be reviewed.</li> </ul> <p>Key theme: Policy P2 new family homes</p> <ul style="list-style-type: none"> <li>Avanton support the removal of the former wording that exclude the Old Kent Road Area Action from the 20% family homes minimum target applied to all other CAZ and Action Area Core locations.</li> </ul> <p>Key theme: Policy P14 residential design</p> <ul style="list-style-type: none"> <li>Object to the point - child play space should be on ground or low level podiums with multiple egress points</li> </ul> <p>Key theme: Policy P16 tall buildings</p> <ul style="list-style-type: none"> <li>Note that the tall buildings map at Figure 4 provides no indication of indicative buildings heights in tall building</li> </ul>	<p>Policy P16 (Tall Buildings) - Further guidance on indicative building heights in tall building locations will be prepared.</p> <p>Policy P30 (affordable workspace) - the policy requires affordable workspace to be secured for 30 years. The policy is sufficiently flexible to enable this space to be marketed to many businesses falling under the definition of an affordable workspace occupier.</p> <p>Policy P53 (car parking) - along with P54 car parking for disabled people should be located within the development and in close proximity to the nearest entrance or lift core.</p> <p>Policy IP3 – The policy has been updated to take into account viability considerations if the policy requirements cannot be met.</p> <p>NSP65 - the OKRAAP will provide further clarity on the education uses required on the site. The site allocation requires the replacement of employment floorspace (E (g), B class) on the site.</p>

Representation	Officer Response
<p>locations, which is contrary to adopted Policy D1 of the London Plan.</p> <ul style="list-style-type: none"> <li>• Recommend that insets to the Proposals Map are prepared that set an upper threshold (i.e. up to 80m) for locations identified as being appropriate for tall buildings across Southwark.</li> </ul> <p>Key theme: Policy P28 Strategic Protected Industrial Land</p> <ul style="list-style-type: none"> <li>• Avanton supports the supplementary text to draft Policy P28 which outlines that LSIS sites allocated in the Old Kent Road for mixed use development will be intensified for residential and industrial co-location.</li> </ul> <p>Key theme: Policy P30 affordable workspace</p> <ul style="list-style-type: none"> <li>• Policy P30 should define what uses are considered as 'employment' uses.</li> <li>• consider it unreasonable to apply a period of 30-years without including a mechanism for release from this restriction. Amended wording to the policy is provided to include reference to 'unless otherwise agreed' for the provision of affordable workspace for at least 30 years.</li> <li>• Alternatively, they recommend that a prescribed period for affordable workspace to be retained should not be set in policy, and instead should be considered on a case by case basis, which would be secured via a Section 106 agreement. In which case, they suggest the deletion of Point 2 in the policy.</li> <li>• Flexibility to the wording should be added to allow for the workspace to revert to being a market unit for an agreed period of time (i.e. 1-3 years) post-practical completion, if an occupier that meets the above</li> </ul>	

Representation	Officer Response
<p>requirements cannot be found during a 6-month marketing period.</p> <ul style="list-style-type: none"> <li>• Point 5 introduces flexibility, whereby in exceptional circumstances affordable retail, affordable cultural uses or public health services may be provided as an alternative to affordable workspace. The applied flexibility is welcomed; however, the current policy would place an onerous obligation on the development that if the alternative affordable use is no longer required, the affordable space would revert back to affordable workspace.</li> <li>• Request that the obligation to return the alternative affordable unit back to an affordable workspace use is removed.</li> </ul> <p>Key theme: Policy P53 car parking</p> <ul style="list-style-type: none"> <li>• Acknowledge the ambition of Policy P53 in reducing residential car parking for all new developments and disincentivising private car usage across the Borough.</li> <li>• On constrained sites, it may not always be achievable to provide all residential car parking within the confines of the Site, which may dictate the need for some parking on the public highway. This is particularly relevant for blue badge parking delivered in accordance with Policy T6.1 of the adopted London Plan (2021), which requires 3% of dwellings to have a blue badge parking spaces from the outset, and a further 7% to be provided in the future. Amended wording to the policy is provided to include reference to blue badge residential parking.</li> <li>• Note the draft policy dictates that developments creating 80 or more homes will be expected to provide a</li> </ul>	

Representation	Officer Response
<p>minimum of three years free car club membership per eligible adult. This requirement is onerous and does not accord with the policy principle that seeks to reduce car usage across Southwark. Request that the policy is amended accordingly.</p> <p>Key theme: IP3 Community Infrastructure Levy (CIL) and Section 106 Planning Obligations</p> <ul style="list-style-type: none"> <li>• Reference to Regulation 123 list should be removed from the policy and 'annual infrastructure funding statements' should be included.</li> <li>• Draft Policy IP3 proposes that a viability assessment will be submitted for all developments that depart from any planning policy due to viability. Concern is raised that the proposed application of this policy could be very onerous and mean that any diversion from planning policy including design-led or transport matters for example could result in the need for a viability assessment. To resolve the objection, it is recommended that this policy makes clear that non-compliance against policy is restricted to matters of affordable housing.</li> </ul> <p>Key theme: NSP65 Sandgate Street and Verney Road</p> <ul style="list-style-type: none"> <li>• Welcome the clarification that 5,300 new homes across site allocation NSP65 represents the minimum number homes to be delivered and support the modification to the Policies Map – NSP65 Site Allocation boundary to incorporate land to the east including Gasholder no.13 and land previously allocated as SPIL.</li> </ul>	

Representation	Officer Response
<ul style="list-style-type: none"> <li>Request amendments to the draft site allocation so that it accords with the corresponding site allocation OKR13 in the Old Kent Road AAP – this requests reference to ‘primary’ schools to be included and B2 use class.</li> </ul>	
<p>Ralph Luck - Kings' College London NSPPSV103</p> <p>Key theme: Policy P5 student housing</p> <ul style="list-style-type: none"> <li>Objection to the removal of ‘subject to viability’ for the 35% affordable student rooms requirement on nomination schemes.</li> </ul>	<p>Policy P5 student homes – the Inspector’s Report at Paragraph 81 confirms ‘we have amended the wording in MM30 to clarify that the provision of a minimum of 35% affordable student rooms should be subject to viability’. This has been amended in the Plan for adoption.</p>
<p>Individual Ralph Smyth NSPPSV164</p> <p>Key theme: Climate mitigation, Transport and infrastructure, air quality and biodiversity and climate change adaptation</p> <p>Climate Change Mitigation:</p> <ul style="list-style-type: none"> <li>Insufficient detail about each scope of emissions 1-3. there is no data to show whether on existing policies Southwark as an area is set to reduce emissions in line with the trajectory set by the Climate Change Act 2008.</li> <li>Sixth Carbon Budget is not reflected in IIA. There is a brief mention in appendix 2. There is no consideration of what the legal requirement to cut emissions by 78% by 2035 means for the IIA and evidence base.</li> </ul> <p>Evidence base:</p> <ul style="list-style-type: none"> <li>Critical of the alternative carbon targets as set out in IIA.</li> </ul>	<p>The updated Addendum to the Energy Background Paper set out further clarifications on the P69 Energy sets out our approach to reducing operational carbon in new development. This covers scope 1 and 2 emissions. The NSP Early Review will review policy options that would consider Scope 1, 2 and 3 emissions and embodied and whole lifecycle carbon. This will be accompanied by an updated evidence base and IIA.</p> <p>The Southwark Spine map will be reviewed to ensure it is correct. The GLA has set out that the NSP is in compliance with the London Plan. The GLA has not raised any issues in their response of this nature.</p>

**Representation**

- Main Modification 3: Policy SP1a Southwark’s Development Targets relating to carbon reduction by 2030 is unclear how the NSP addresses this. Likewise main modifications.
- SP2 and P14 amendments to do not propose effect climate change policy.
- Monitoring of carbon emissions is inadequate and not effective as it fails to allocate emissions by carbon budget period.
- More generally the underlying analysis and evidence base is viewed as inadequate.

**Transport and Infrastructure**

- Southwark should revise wording to shift from managing increases to demand management of traffic levels, this has not been included. This is inconsistent with the London Plan and Mayor’s Transport Strategy.
- The NSP is not effective as it does not reallocate space to active travel other than for disabled parking. This in turn is in breach of the Network Management Duty.
- Inadequate reduction in car parking set out in policy.
- The revised Southwark Spine map is still wrong and a different route to what a different part of Southwark Council has built. Map is ineffective.

**Air quality and Biodiversity**

- Add WHO Air Quality Guidelines to Air Quality Positive requirement evidence base to make it positively prepared.
- (P59 Biodiversity) is still inadequate in failing to plan coherent ecological networks and does not meet

**Officer Response**

P59 Biodiversity is in compliance with the London Plan. As it is not adopted into law, the nature recovery does not need to be incorporated in the NSP. This will be reviewed in the NSP Early Review.

The Flood Risk policy is in compliance with the London Plan.

Further approaches to climate change adaptation will be explored in the NSP Early Review.

Representation	Officer Response
<p>the new national target for nature recovery by 2030, set to become law by October 2021.</p> <p>Climate Change Adaptation</p> <ul style="list-style-type: none"> <li>• Critical of flood management due to Thames Barrier only having a design life to 2030.</li> <li>• Critical of climate change adaptation references made to policies under SP6, as does not contribute much.</li> <li>• Critical of flood risk evidence base.</li> <li>• Critical of not referring to reallocating car parking to increasing tree canopy in heat islands and sustainable drainage schemes to have net positive impacts on surrounding areas already under stress even at 1.2C of climate change in policy.</li> </ul>	
<p>Individual Richard Lee NSPPSV148</p> <p>Key theme: Legal compliance</p> <ul style="list-style-type: none"> <li>• The revised IIA documents fail to test the main modifications, failing to analyse the particular impacts on protected groups.</li> <li>• Objects to the Main Modifications being used to erase the adopted Area Action Plans. Reference to the three AAPs should be reinstated.</li> <li>• Consultation is required on the implications of rescinding the Aylesbury AAP.</li> </ul> <p>Key theme: Aylesbury Area Vision</p>	<p>Aylesbury - the updated IIA considers the amendments to the policies and sites within the Main Modifications.</p> <p>The justification of rescinding the AAPs is set out in EIP211 it confirms that reviews of all of the policies in the AAPs took place and they have been replaced in the NSP with more up to date policies. Consultation has taken place on these policies and they are going through examination.</p> <p>Reviews of all of the sites in the AAPs took place, the Council set out the current status of each site in the AAPs to decide which sites should be taken forward in the NSP. The Council removed all of the sites that are being built or that were completed from the list to take</p>

**Representation**

- The ‘golden thread’ of the Climate Emergency, in particular refurbishment, has not been included through the Main Modification.
- The policy in the AAAP on building heights will clearly have to change given the higher densification of homes, but there is no transparency here as we are told that all AAAP policies have been incorporated into the NSP.
- Concern that the Public Sector Equality Duty has not been met, there is no change in the IIA from the previous version.

Key theme: Policy P14 residential design

- To incorporate the detail of the AAAP into P14 requires explicit reference to the space standard of Parker Morris + 10% and an explanation of what this means.
- Whilst MM 39 does say that the Aylesbury standard will be different, the text is not clear and illustrates the difficulty of trying to transpose the specific detail of an Area Action Plan into a Borough wide Local Plan.

Key theme: NSP01A Aylesbury

- Concern raised about the delivery timeframe of homes, it shows a shift in focus towards replacing all the existing social rented housing and away from new supply.
- The phasing information from the AAAP as set out in Annex 5 is not incorporated.
- The text for Site 1a also fails to align with the text in the Aylesbury area vision. The site allocation is not justified and should be deleted.

**Officer Response**

forward to the NSP. All of the other sites that were in the AAPs have been included in the NSP. The Council then consulted on these sites and they are being examined. The exception is the detail on the core area for the Aylesbury AAP, the proposed main modification is set out in EIP 202a.

Guidance on the height of development within the Aylesbury Area Core is set out in NSP01a.

The NSP has been prepared to reach net carbon zero by 2050. The Early Review will review policy to reach the 2030 net carbon zero target. The climate emergency is considered throughout the New Southwark Plan and it should be read as a whole.

Noted re. P14, the standards have been set out in the policy and the background of the Parker Morris +10% is not required to be in the policy itself.

The delivery of homes in Aylesbury is set out in the housing trajectory.

It is not clear how the text for NSP01a is not aligned with the area vision.

Monitoring for Aylesbury – the monitoring framework recognises that the indicators will be monitored by vision areas and site allocations.

Bermondsey and London Bridge – the area vision boundaries for Bermondsey and London Bridge were amended in the Main Modifications to reflect the localities and the Area Visions, in the Inspector’s Report they have confirmed at Paragraph 52 that ‘whilst concerns were raised regarding the delineation of the boundaries of

**Representation**

- Key theme: Monitoring framework with regards to Aylesbury
- SP2 proposed indicator “number of residents who choose to stay in the local area (either on Aylesbury estate or nearby roads)” fails on 2 counts –“or nearby roads” is not precise and could include the whole ward area; the data should be provided by a residents survey if we are to assess the choice made by residents.
  - Concern raised that there is only one monitoring indicator for Aylesbury.

- Key theme: Bermondsey area vision
- Concern raised about wording agreed in Statement of Common Ground is now in the Bermondsey vision – this was not raised with him.
  - The addition in the MM of a large area to the west of Bermondsey Street extending to Borough High Street has not been consulted on and is unsound.

- Key theme: London Bridge area vision
- The above change to the Bermondsey area vision needs to be placed in the London Bridge area vision.

- Key theme: NSP50 Land between Melior Street, St Thomas Street, Weston Street and Fenning Street
- Welcome the existing uses now recognising the Melior street community garden (protected open space), but the redevelopment of the site does not mention the provision of open space. Furthermore, there is no mention of biodiversity net gain. To be policy compliant, Site 50 must mention

**Officer Response**

the Bermondsey and London Bridge Area Visions, we consider these are appropriately drawn and reflect where the Area Vision (AV) policies will apply’. As the boundaries were changed the Area Visions were considered in regards to the role of the area and amended accordingly to reflect the amended boundary.

NSP50 – redevelopment must ensure the Other Open Space of Melior is retained, Policy P56 protects open space. Policy P59 sets out the requirement for biodiversity net gain in developments, this will apply to any redevelopment on NSP50.

NSP51 - Policy P59 sets out the requirement for biodiversity net gain in developments, this will apply to any redevelopment on NSP51.

Policy P11 confirms that we will work to address the need for culturally appropriate accommodation wherever possible. This could be at a local, sub -regional or regional level. Where culturally appropriate accommodation is not possible, the need for accommodation will be addressed through the plan -making process.

Policy P59 Biodiversity the financial contribution is used only in exceptional circumstances, achieving a net gain in biodiversity is the requirement that new development, of the defined threshold, must adhere to in line with the London Plan.

Policy P60 Trees, overall support noted.

Policy P61 Reducing Waste, the Circular Economy includes reuse, reduce and recycle in the assessments, the Early Review will explore

Representation	Officer Response
<p>that Melior Street community garden will be retained and extended.</p> <ul style="list-style-type: none"> <li>To be in compliance with all policies under SP6, Climate Emergency, the table needs to state positively how it will contribute to the reduction in carbon emissions and provide locations for trees.</li> </ul> <p>Key theme: NSP51 Land between St Thomas Street, Fenning Street, Melior Street and Snowfields</p> <ul style="list-style-type: none"> <li>Welcome the MM quantifying the amount of open space, but it must be clear that that there will be increased space for nature and habitat (biodiversity net gain) as open space could mean hard standing or manicured green space without biodiversity.</li> </ul> <p>Key theme: SP2 Southwark Stands Together</p> <ul style="list-style-type: none"> <li>The title “Regeneration that works for all” has been changed into “Southwark Stands Together”. As a result, many aspirations of community groups are lost. There is a mention to climate emergency and achieving the goal of net-zero emission by 2050, but there is no mention of refurbishment over demolition (Circular Economy).</li> <li>“Southwark Stands Together” is a Council policy document inspired by Black Lives Matter. This gives an opportunity for SP2 to take a strong stand for regeneration that meets the needs of the Black communities of the Borough, which has not been realised.</li> </ul> <p>Key theme: Policy P11 Gypsies and Travellers</p>	<p>a new local threshold for Circular Economy Statements. The current threshold aligns with the London Plan.</p> <p>Policy P64 Air Quality, these changes were implemented after discussions with the Environment Protection team. The monitoring framework is a live document to indicate how monitoring of the NSP could be delivered. The NSP Early Review will include a review of these indicators.</p> <p>SP2 – Noted. The change in title of the policy is considered acceptable. Requires for development to utilise circular economy principles are defined in Policy P61.</p>

Representation	Officer Response
<ul style="list-style-type: none"> <li>• There is a recognition that an additional 27 pitches will be provided. However, there is no information and policy that explains how the additional provision will be achieved. This is unsound and must be changed.</li> </ul> <p>Key theme: Policy P59 biodiversity</p> <ul style="list-style-type: none"> <li>• Concern raised about achieving developers to meet the biodiversity requirement through urban greening which does not guarantee biodiversity.</li> </ul> <p>Key theme: Policy P60 trees</p> <ul style="list-style-type: none"> <li>• The reasons have been amended to state that mature trees will be given more weight due to their important role in storing carbon and mitigating climate change. It also elaborates on the 'Right Tree Right Place principle' which ensures the right size and species of trees are considered so as to provide long-term benefits. These are important issues which for effectiveness must be given more weight in decision making. The ecological and environmental value of mature trees in mitigating climate change impacts should be recognised in the policies.</li> </ul> <p>Key theme: Policy P61 reducing waste</p> <ul style="list-style-type: none"> <li>• The Council seems to be only focusing on 'reducing and recycling waste', whilst missing the more important aspect of the Circular Economy. This includes prioritising refurbishment and repurposing of existing buildings, promoting new design of buildings to be flexible for different uses and adaptable for future</li> </ul>	

Representation	Officer Response
<p>changes. MM's on circular economy should include these principles.</p> <p>Key theme: Policy P64 improving air quality</p> <ul style="list-style-type: none"> <li>• Concern raised over the deletion of two policies on the use of abatement technologies to reduce the emission levels. The council gives no clear reason for these amendments which are not requested by the Inspector.</li> </ul> <p>Key theme: Monitoring framework – new Annex 4</p> <ul style="list-style-type: none"> <li>• Concern raised over the some of the monitoring framework indicators, some additional indicators are required and no timeframe is indicated for the 'future digital monitoring tool'.</li> </ul>	
<p>ROK Planning on behalf of Shurgard</p> <ul style="list-style-type: none"> <li>• Support the employment and job targets in Policy SP1a and Old Kent Road Area Vision</li> <li>• Support site allocation NSP53 (land bounded by Glengall Road, Latona Road and Old Kent Road) that requires at least the same amount of employment site to be reprovided on the site</li> <li>• Support the site allocations providing 35,850sqm employment floorspace in Camberwell Area Vision, however the re-provision of existing employment floorspace should be flexible to allow a range of employment uses</li> <li>• Support Policy P53 (car parking) which states off site car parking spaces should be determined by demand.</li> </ul>	<p>Support noted. Employment uses should be provided based on current market demand as per Policy P29. Car parking requirements are set out in the revised Tables 11 and 12 which have been updated to be in conformity with the London Plan. It is not considered the requirement for affordable workspace would result in undeliverable developments for single occupiers and affordable workspace has previously been delivered with storage developments. If it is not practical to provide affordable workspace on site, there is also the option to provide an in-lieu payment. Viability evidence was submitted as part of the examination process.</p>

Representation	Officer Response
<p>There should be flexibility for B8 uses based on demand and trip-generation as per Policy T6.2 in the London Plan.</p> <ul style="list-style-type: none"> <li>• Policy SP4 and Policy P30 (affordable workspace) – 10% requirement is too broad an approach and would result in single occupier developments being unviable and undeliverable. Affordable workspace should be required on a case-by-case basis and be viability tested to ensure the policy does not prevent certain types or occupiers of industry from delivering much needed industrial floorspace and employment.</li> </ul>	
<p>ROK Planning on behalf of Unite Group NSPPSV198</p> <p>Key theme: Policy P5 Student homes</p> <ul style="list-style-type: none"> <li>• Support the modification to reduce the requirement for wheelchair adaptable dwellings from 10% to 5%.</li> <li>• Support the principle of the modification proposed to part 3 of the policy which removes the requirement for student schemes let via nominations agreement to provide conventional affordable housing however, consider the phrase ‘subject to viability’ should be re-instated in order to ensure the policy is in conformity with London Plan policy H15, specifically part 4b which states that applications should follow the viability tested route where 35% affordable student rooms are not provided.</li> <li>• It is argued that the requirement for conventional affordable housing should also be removed for direct-let student schemes (part 2).</li> </ul>	<p>Policy P5 students - the Inspector’s Report at Paragraph 81 confirms ‘we have amended the wording in MM30 to clarify that the provision of a minimum of 35% affordable student rooms should be subject to viability. This would ensure broad conformity with London Plan 2021 Policy H15 (part 4(b)). There is also a need to amend the detailed wording in MM30 to remove potential inconsistencies and to confirm that affordable student rent is that which is set by the Mayor of London through the annual monitoring process. Subject to these further changes we recommend MM30 accordingly’. This has been amended in the Plan for adoption.</p> <p>The requirement for conventional affordable housing is due to the need for affordable housing in the borough as set out in the Students Background Paper and the Housing Background Paper.</p> <p>Policy P5a purpose built shared living accommodation – where it is not feasible to provide conventional affordable housing on site this</p>

<b>Representation</b>	<b>Officer Response</b>
<p>Key theme: Policy P5a purpose built shared living accommodation</p> <ul style="list-style-type: none"> <li>• Support the inclusion of a standalone policy.</li> <li>• Request the requirement for conventional affordable housing should be removed and only contributions towards affordable housing should be sought from co-living developments in conformity with London Plan policy H16.</li> </ul> <p>Key theme: Policy P52 cycling</p> <ul style="list-style-type: none"> <li>• Object that no modifications are proposed to policy P52 which requires cycle parking to be delivered at a level of 1 space per bedroom for student accommodation and co-living development (Sui generis). The standards are not compliant with the London Plan which requires only 0.75 spaces per bedroom.</li> </ul>	<p>should be demonstrated and justified and if this is accepted an in-lieu payment to go towards the delivery of affordable homes will be accepted.</p> <p>P52 Cycling – Appropriate to encourage sustainable transport modes for residents of the accommodation. This policy is adequate in its current form and any suitable alternative cycle parking facilities will be considered at the planning stage.</p>
<p>Rolfe Judd on behalf of London School of Economics &amp; Political Science NSPPSV113</p> <p>Key theme: Policy P5 student homes</p> <ul style="list-style-type: none"> <li>• Clause 3 (nomination schemes) should be reworded to ensure clarity of the policy and ensure that the maximum amount of affordable student rooms at affordable student rent (as defined by the Mayor of London) with a minimum of 35% affordable student rooms are provided.</li> </ul> <p>Key theme: Policy P21 borough views</p> <ul style="list-style-type: none"> <li>• LSE strongly supports the revised of P21 and Annex 1 on borough views. However in line with the policy guidance in</li> </ul>	<p>Policy P5 student homes – noted. The Inspector’s Report at Paragraph 81 confirms ‘we have amended the wording in MM30 to clarify that the provision of a minimum of 35% affordable student rooms should be subject to viability. This would ensure broad conformity with London Plan 2021 Policy H15 (part 4(b)). There is also a need to amend the detailed wording in MM30 to remove potential inconsistencies and to confirm that affordable student rent is that which is set by the Mayor of London through the annual monitoring process. Subject to these further changes we recommend MM30 accordingly’. This has been amended in the Plan for adoption.</p>

Representation	Officer Response
<p>Paragraph 16 (b) of the NPPF which states that Plans should be prepared positively, in a way that is aspirational but deliverable, LSE consider Policy P21 should read as 'development should' and not 'development must'.</p>	<p>Policy P21 – borough views – Support noted.</p>
<p>Individual Sam Taylor-Wilmshurst</p> <p>Key Theme: Consultation</p> <ul style="list-style-type: none"> <li>• Consultation not accessible to general public. It needs a high level executive summary outlining major changes</li> </ul>	<p>Consultation on the modifications was carried out in accordance with the relevant regulations.</p>
<p>Sarah Hind</p> <p>Key Theme: Southwark Spine</p> <ul style="list-style-type: none"> <li>• Concerned about the cycle route going through Burgess Park instead of along Wells Way. This route has not been properly planned or consulted on. Burgess Park is very busy and can be hazardous</li> </ul>	<p>The Cycle Strategy 2015 provided an indicative and illustrative map for the Southwark Spine that allows the route to be updated and developed “wherever possible”. This allows the council to respond to new opportunities, for example from new developments.</p>
<p>Individual Sarah Vaughan NSPPSV502</p> <p>Key theme: P60 Trees</p> <ul style="list-style-type: none"> <li>• P60 Trees does not comply with the revised NPPF</li> <li>• Policy needs to set how monitor the condition of trees, penalties for non-delivery of tree planting and maintenance and taking into account carbon and eco-</li> </ul>	<p>P60 Trees is in compliance with the revised NPPF (2021). Paragraph 180 (C) of the revised NPPF sets out development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and.</p>

Representation	Officer Response
<p>system services lost and CAVAT (Capital Asset Value for Amenity Trees).</p> <ul style="list-style-type: none"> <li>Plantable space should be created for trees alongside new development</li> </ul>	<p>P60 Trees point 4 sets out that development should retain and protect the borough's trees, and any retained trees must be replaced if removed to facilitate development.</p>
<p>Savills on behalf of Bermondsey Yards (Aviva) Savills on behalf of and Newington Square Ltd</p> <p>Key Theme: Policy P30 (affordable workspace)</p> <p>The policy is ineffective for the following reasons</p> <ul style="list-style-type: none"> <li>Point 2.1 should be amended to specify the policy applies to net additional employment floorspace rather than gross otherwise it would undermine refurbishments and extensions.</li> <li>The reasons should be updated to state the policy only applies to Net Internal Area (NIA) which would mean calculations are not based on unusable areas such as circulation spaces.</li> <li>There should be more flexibility in the policy so that affordable workspace is not provided in areas where SMEs are declining due to high land costs. References in respect of the above 3 points are given to the Lambeth Inspectors report.</li> <li>Point 5 which relates to alternative retail or cultural uses should not be framed as an exceptional circumstance and as a result is too inflexible.</li> <li>Class E was introduced to give more flexibility to move between uses in Class E so it should not be unduly restricted in the policy.</li> </ul>	<p>The updated wording to the reasons of the affordable workspace policy clarify the circumstances in which the policy applies; to extensions over 500sqm and new developments (regardless of any floorspace that will be demolished) or changes of use over 500sqm. This has been justified in evidence given in the EIP and through additional viability evidence. The need for affordable workspace is for employment uses as demonstrated in our evidence base needs report. There is a clause allowing for alternatives such as retail or cultural uses but this is only with a demonstrated need and named occupier, so it is correct that the policy should remain applying only to exceptional circumstances. The use of conditions for use class E is necessary because the need for affordable workspace is in classes E(g) specifically. The policy requires the measurement to be based on GIA. This is reasonable to determine 10% total floorspace for the affordable workspace and for both the commercial and affordable elements to be functional they need to have circulation space included.</p>

<b>Representation</b>	<b>Officer Response</b>
<p>Savills on behalf of KMP Group</p> <p>Key theme: 17-21 Rotherhithe Old Road - site allocation CWAAP9: 23 Rotherhithe Old Road which as defined within the Canada Water Area Action Plan (CWAAP)</p> <ul style="list-style-type: none"> <li>• requesting that the site is included as site allocation as the whole site has not been developed yet in its entirety. The Council have confirmed in principle support for a residential redevelopment at 17-21 Rotherhithe Old Road during pre-application discussions earlier this year.</li> <li>• A new “indicative minimum” capacity of 20 new homes should be identified. The policy context, driven by a pressing need for good quality and affordable homes at both local and national levels, has moved on considerably since the adoption of the CWAAP and the designation of site allocation CWAAP9.</li> <li>• It is therefore requested in line with the above that as part of the NSP, site allocation CWAAP9 is reviewed and refreshed.</li> </ul> <p>Key theme: Policy P14 residential design</p> <ul style="list-style-type: none"> <li>• Request that the private external amenity standards set out under draft Policy P14 fact box are amended to align with the minimum requirements set out under London Plan Policy D6. The wording should therefore be amended to refer to a minimum of 5 sq.m. of private outdoor space to be provided for 1-2 person dwellings and an extra 1 sq.m. for each additional occupant thereafter.</li> </ul>	<p>17-21 Rotherhithe Old Road - site allocation CWAAP9: 23 Rotherhithe Old Road is allocated within the Canada Water Area Action Plan (CWAAP) which will be rescinded on adoption of the plan - redevelopment of this site can come forward under the relevant development management policies of the plan as a windfall site.</p> <p>Policy P14 residential design - the requirement is in general conformity with the London Plan, we recognise the importance of amenity space for residents and the requirement is carried over from the Residential Design Standards SPD.</p>
<p>Savills ON BEHALF OF THAMES WATER UTILITIES LTD NSPPSV421</p>	

Representation	Officer Response
<p>Key Theme: Housing Capacities</p> <ul style="list-style-type: none"> <li>• Increase in housing numbers from site allocations from 31,983 to 36,760 during the plan period. It is not clear how this increase will be spread across the allocations.</li> <li>• It is recommended that the Developers and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan.</li> <li>• We would welcome the Councils support in encouraging developers to contact Thames Water as early as possible to discuss their proposals and intended delivery programmes.</li> </ul>	<p>Residential capacities for each site are detailed in individual site allocations as well as in EIP82b Sites Allocations Methodology report.</p> <p>Developers will be requested to contact Thames Water as early as possible in the development process</p>
<p>Savills on behalf of Safestore NSPPSV157</p> <p>Key theme: Affordable workspace and industrial uses</p> <ul style="list-style-type: none"> <li>• Concern that the viability of B8 storage uses has not been tested and the requirement for affordable workspace on B8 uses would be impractical in terms of management and limit the commercial competitiveness of the owner occupier.</li> <li>• Request edits to Policy SP4 relating to affordable workspace that it should be subject to viability</li> <li>• Suggests there should be main modifications to Policy P27 (access to employment and training) to become a 'should' requirement rather than a 'must' requirement and make explicit that where viability is an issue, a financial payment can be made instead, which will be considered on a site by site basis.</li> <li>• Policy P28 (SPIL) places undue restrictions on B8 occupiers by requiring an increase in jobs. This is not</li> </ul>	<p>P27 – The amendments suggested are not considered to be necessary for soundness. The requirements are already in adopted policy and the S106 SPD, including the arrangements for financial contributions if jobs cannot be provided on site.</p> <p>P28 - The representation is noted regarding the requirement to increase the number of jobs when it comes to self storage businesses specifically. It is acknowledged these businesses could generate employment opportunities in the wider economic context. However the policy as currently worded is flexible enough to acknowledge wider job creation in an economic context, encouraging a wide range of industrial uses, and the council is keen to ensure the policy encourages an increase in jobs particularly where industrial uses are intensified.</p>

Representation	Officer Response
<p>positive or effective and more flexibility should be allowed for job generation to be recognised off-site for example through supply chains and changes as a result of the pandemic.</p> <ul style="list-style-type: none"> <li>Policy P30 (affordable workspace) – consider the wording relating to ‘small and independent businesses’ is ambiguous because it is not clear if we mean a business falling into either definition, or both. The policy should include reference to viability. Further clarification is needed on the mechanism of the affordable workspace calculator.</li> <li>Policy P32 (business relocation) - policy could conflict with legal framework and existing agreements for tenants. There are commercial sensitivities in providing this information prior to the determination of a planning application. Request the business relocation strategy is secured at S106 stage.</li> </ul>	<p>P30/SP4 - The definition of small and independent businesses is considered to be appropriate and the provision of affordable workspace includes space for existing businesses which the policy has the intention of supporting. The changes suggested include wording about viability. We consider the policy to be sound and the requirements to be deliverable and viable however we would expect any sites not meeting the policy requirement to provide a viability assessment. This is now captured in modifications to Policy IP3. The Affordable Workspace SPD will provide more information on the affordable workspace calculator however we welcome applicants to discuss the inputs of the calculator with the planning policy team on submission.</p> <p>P32 - The respondent requests a number of deletions to the policy wording and is concerned that occupiers may not wish to engage with applicants in planning negotiations and that there may be commercial sensitivities. The policy wording is considered to be sound, in that this information is required to establish the circumstances around existing businesses on the site. In order to understand the existing businesses present on the site, this information should be submitted with a planning application however the detail of the relocation strategy may be reserved for S106 negotiations.</p>
<p>Shiva Ltd NSPPSV297</p> <p>Key theme: Tall Buildings</p> <ul style="list-style-type: none"> <li>Tall building definition needs to be specific to context and be for each site allocation</li> </ul>	<p>The tall buildings definition defines the general heights for the borough, and defines taller buildings as lower than tall</p>

<b>Representation</b>	<b>Officer Response</b>
<ul style="list-style-type: none"> <li>• Figure 3 in the background paper and figure 4 in the NSP include conservation areas in these tall buildings zones.</li> <li>• Critical of the Shard being used as the centre of tall buildings policy</li> <li>• NSP50 – unclear how the shard is relevant to NSP50</li> <li>• NSP51 – critical of lack of clarity around the tall buildings and their height.</li> </ul>	<p>buildings. Both of these are set out in site allocations to indicate where is suitable for different site context and scales.</p> <p>The impact on the heritage significance of conservation areas is assessed through the planning application process and the implementation of heritage and design policies.</p> <p>The Shard is a London wide landmark and there are protected borough views and London View Management Framework views surrounding the site which inform the stepped down approach at this location. These views cover site allocations in London Bridge.</p>
<p>Southwark Law Centre NSPPSV167</p> <p>Key theme: NSP01A Aylesbury Action Area Core Raise concern with the rescinding of the Aylesbury AAP without consultation being undertaken. Would support an additional hearing session to discuss this matter.</p> <p>Concern raised that the Aylesbury Area Action Plan formed the basis of a legitimate expectation for the residents of the Aylesbury estate for the proposed re-development and if this is not amended with a sound evidence base, justification for change and consultation do not see how it can comply.</p> <p>The representation includes a comparison table detailing substantive differences between the Aylesbury Area Action Plan and the New Southwark Plan regarding number of homes, phasing of development, design, building height, open space, walking, cycling and public transport, community facilities, employment, retail and infrastructure.</p>	<p>Detailed justification for rescinding the Aylesbury Area Action Plan is set out in EIP202a Aylesbury Background Paper Update. The amendments set out are necessary for soundness of the New Southwark Plan (Paragraph 35 of the National Planning Policy Framework), in particular effectiveness to include the allocation and relevant policies from the Aylesbury Area Action Plan in the New Southwark Plan to provide certainty on development coming forward in the Aylesbury Area Action Core instead of the different policy requirements being set out in two documents which may lead to confusion if some standards for housing and parking are different in both documents. In addition, it is necessary to ensure the Plan is positively prepared as the development coming forward in the Aylesbury Action Area Core includes significant delivery of new homes in the borough and therefore will contribute to meeting the borough’s housing requirement. The Aylesbury AAP will be presented to Cabinet to set out that it should be rescinded on adoption of the NSP.</p>

Representation	Officer Response
	Where required, the AAP policies have been carried forward into the NSP.
<p>Southwark Law Centre, Southwark Traveller Action Group and London Gypsies and Travellers</p> <p>Key theme: P11 Gypsy and Traveller accommodation</p> <ul style="list-style-type: none"> <li>• Supports the overall change to P11 as it now addresses the need for those seeking culturally appropriate accommodation but feel reason 1 sentence ‘where culturally appropriate accommodation is not possible, the need for accommodation will be addressed through the plan-making process’ makes the policy unjustified</li> <li>• Concerned that action points from inspectors were not answered</li> <li>• EQIA does not properly analyse if culturally appropriate accommodation is not available how this would impact the community. The inclusion of a provision allowing the needs of Gypsies and Travellers in the borough “to be addressed through the plan-making process” has not been adequately considered against the Equality Act 2010 provisions and the protected characteristic of race. It does not go into the fact that the younger members of the Traveller community will suffer if they are not provided with new pitches.</li> <li>• Monitoring Framework is not effective as no criteria for the provision of additional pitches to meet the need for culturally appropriate accommodation</li> <li>• Concerns around a group offering right to buy, need more commitment to upgrade existing sites and to meet the need for culturally appropriate accommodation</li> </ul>	<p>The policy is justified with the inclusion of ‘where culturally appropriate accommodation is not possible, the need for accommodation will be addressed through the plan-making process’ as this may be necessary to address the need for accommodation if there are no pitches available.</p> <p>The Inspectors have been provided with the necessary evidence to determine the soundness of the Plan.</p> <p>The EQIA does acknowledge that those seeking culturally appropriate accommodation may be impacted by the policy particularly those who do not meet the PPTS definition because they fall into another protected characteristic e.g. elderly people who can no longer travel. However, as set out in the EQIA other policies and council services provide additional support for the elderly, this does not exclude gypsies and travellers.</p> <p>The purpose of the Monitoring Framework is to assess the effectiveness of the policy not to provide for additional pitches.</p> <p>The council is aware of this and it is being addressed by the council housing team.</p>

Representation	Officer Response
<p>Southwark Law Centre on behalf of South Dock Marina Berth Holder Association NSPPSV468</p> <p>Key Theme: Protection of boatyard</p> <ul style="list-style-type: none"> <li>• Support rescinding of CWAAP16 but oppose NSP without protection of the South Dock Marina and boatyard</li> <li>• Still concerned assessment is not progressing in a timely way and no update around early amendment procedure following needs assessment</li> </ul>	<p>In the Inspector’s Report they have noted that ‘Policy P57 of the Plan provides a positive framework for managing proposals on the Borough’s open water spaces, including the consideration of additional berth provision for houseboats on underused water spaces. Additionally, Policy P24 of the Plan provides a positive framework for assessing proposals for additional moorings and other facilities within the Thames Policy Area. Given these policies it would not be necessary for soundness to specifically safeguard or protect water spaces in the Borough in terms of existing houseboats and/or their potential to accommodate additional berths’. Accordingly a site allocation is not required in the Plan.</p> <p>The assessment is ongoing. As set out in the Statement of Common Ground, an early amendment review will be set out in the LDS when it is updated.</p>
<p>Southwark Law Centre on behalf of XR Southwark Lobbying Group</p> <p>Key theme: Climate Change</p> <ul style="list-style-type: none"> <li>• NSP does not meet the legal compliance for decarbonisation</li> <li>• Critical of a lack of baseline data</li> <li>• Published Climate Change Strategy is not reflected in the new policies – this covers Scope 1, 2 and 3 emissions</li> </ul>	<p>The Early Review of the NSP will review and update policy to meet the 2030 net carbon zero target. The Addendum to the Energy Background Paper provided additional information on the carbon reduction targets and options. This will include an update to the evidence base.</p> <p>P56 Open Space recognises the role of open spaces in adapting to climate change.</p>

Representation	Officer Response
<ul style="list-style-type: none"> <li>• Critical of lack of baseline data and want a climate change risk assessment to inform policies and transparent carbon offsetting</li> <li>• Vagueness in SP1a Southwark’s development targets relating to Climate Change</li> <li>• Critical that plan goes to 2050 and not 2030 net carbon zero target</li> <li>• SP6 – critical of lack of detail, context, baseline and targets for carbon reduction</li> <li>• Generally supportive of amenity policy</li> <li>• P56 Open Space – amendments needed to emphasise importance of open space in protecting population from climate change</li> <li>• P59 Biodiversity – need to be clearer about offsite contributions approach</li> <li>• P60 Trees – confirm approach to securing replacement trees, need inclusion of ‘Right Tree, Right Place’ principles</li> <li>• P61 Reducing Waste – extend requirements for circular economy statements beyond Major Referrable schemes</li> <li>• P64 Air Quality – critical of offsite contribution and any application not achieved air quality neutral or above should be refused</li> <li>• P68 Sustainability Standards – policy should request Sustainability, Design and Construction statements</li> <li>• P69 Energy – do not support carbon offsetting and wants whole life-cycle carbon assessments for all developments going to planning committee – and want to include reuse and retrofit policy</li> </ul>	<p>Under P59 Biodiversity, there is no measurement of offsite contributions in the monitoring framework.</p> <p>P61 - to make this requirement change for Circular Economy Statements further evidence is required. Currently this requirement aligns with the London Plan (2021).</p> <p>The Monitoring Framework is a starting point for monitoring and is a live document.</p>

Representation	Officer Response
<ul style="list-style-type: none"> <li>Monitoring Framework – no referable baselines and the proposed metrics are not deemed effective with regard to climate change</li> </ul>	
<p>Spatial Planning on behalf of Transport for London NSPPSV181</p> <p><b>Key Theme:</b> OKR Area Vision, P52 and P53 cycle and car parking</p> <ul style="list-style-type: none"> <li>Welcome all the changes that were agreed in the Statement of Common Ground including on the bus garage sites relating to retaining bus capacity and references to the Bakerloo Line safeguarding.</li> <li>In the OKR Area Vision, would like the dates to be removed for Phase 2 (2023-2027) because the BLE will not be operational before 2030.</li> <li>Welcome the changes to the cycle and car parking standards in Tables 10-12 to be consistent with the London Plan but believe there are typographical errors where GIA is still referenced instead of GE</li> </ul>	<p>The date of Phase 2 has been updated to post 2023. The reason why some GIA is left in Tables 10-12 is because the NSP already had higher standards than the London Plan using GIA, so if we changed it to GEA this would in effect result in less cycle parking than previously consulted on. Where the standards have been increased to be in alignment with the London Plan, we have used GEA. This has resulted in a different measurement for some standards.</p>
<p>Sport England NSPPSV170</p> <p>Key theme: Policy P44 Healthy developments</p> <ul style="list-style-type: none"> <li>Support the change made to remove sport from the exceptional circumstances section. More clarification would be helpful in the policy however to explain how the</li> </ul>	<p>The addition of the line ‘The retention or provision of sports facilities is considered on a borough wide basis’, was added to ensure the policy reflects PPG and Sport England guidance on assessments for sports facilities need, which are done on a borough-wide basis.</p>

Representation	Officer Response
<p>retention or provision of sport facilities would be considered on a borough wide basis.</p>	
<p>Individual Steve Lancashire NSPPSV172</p> <p>MM1 (Purpose and contents): The Old Kent Road AAP is still in development and there has been no consultation about this and the removal of the Aylesbury AAP to date all throughout the process. This must be rectified.</p> <p>MM23 (Old Kent Road Area Vision) – I’m very concerned about the reality of timescale for the Bakerloo line extension and its impact on phase 2 development, which requires alternative proposals Plan B to be developed to prevent planning blight and retain jobs. This has not been addressed.</p> <p>MM68 (Policy P55 - Protection of Amenity) – I believe protection of outdoor community space is an essential part of local amenity that should be recognised in this policy on a case by case basis.</p> <p>Also see comments which are the same as the 35% campaign.</p>	<p>The council needs to demonstrate how the employment targets responding to an identified need will be met in the borough. Throughout the Examination process, the employment figures in Table 1B to meet the identified targets have increased. This is due to updated information about planning applications and approvals and an updated masterplan for the Old Kent Road AAP. Whilst the site allocations will go some way to meeting the employment targets, Table 1B and the site allocations methodology paper also identifies areas of the borough where office provision may increase, for example through approved or proposed planning applications outside the NSP site allocations. These have been recorded separately. The target for office floorspace is 460,000sqm over the plan period, however the plan also contains a target for other types of employment floorspace (e.g. industrial) of 90,000sqm net increase over the plan period bringing the total to 550,000sqm. The employment figures in Table 1B include all types of employment uses. In relation to Plot H1 the point was made in the background document that the proposal for office uses on the site would not replace any housing development that has already been accounted for in the housing supply pipeline.</p>
<p>Individual Stuart Carruthers</p>	

<b>Representation</b>	<b>Officer Response</b>
<p>Key Theme: P11 Gypsy and Traveller accommodation</p> <ul style="list-style-type: none"> <li>• Questioning need for P11 if none of the residents meet the PPTS definition. Suggests that there may be a need for policy for ethnic Gypsy and travellers who do not meet the need which may include a policy to enable relocation to less developed areas.</li> </ul>	<p>P11 is required to set out criteria for new sites if needed as well as to safeguard existing sites where needed.</p>
<p>Susan Crisp NSPPSV456 Key theme: Environment and Monitoring Framework</p> <p>Comments on the monitoring framework:</p> <ul style="list-style-type: none"> <li>• Policy 56 Open spaces - Indicator - Loss of open space net loss of open space in hectares and questions if this includes green space/open space on estates?</li> <li>• Policy 59 Biodiversity - Indicator - Number of green spaces Number total per 1000 of population - Does this include green spaces on estates and will it show the reduction of green spaces on estates due to infill schemes and the reduced amount of green space?</li> <li>• Policy 60 Trees - No indicator relates to management or survival rate of trees planted. This is critical both the council own tree planting and for any developers planting both off and on site. Trees should be monitored and reported on during the maintenance period. The replacement ratios for lost trees in terms of tree canopy.</li> <li>• Policy 46 Community facilities- Indicator – Amount of leisure, arts and cultural floorspace being lost or gained (net) approvals and completions - Does this include ball courts and MUGAS facilities on estates? Or on all of the</li> </ul>	<p>Policy P56 Open Space indicators monitor open space as defined in the NSP – this includes MOL, BOL, and OOS.</p>

Representation	Officer Response
<p data-bbox="300 252 1057 354">above alternative indicators which cover the issues of loss of amenity – green space, leisure space on estates.</p> <p data-bbox="206 437 689 466">Key theme: Southwark Spine Map</p> <ul data-bbox="250 475 1088 1024" style="list-style-type: none"> <li data-bbox="250 475 1088 616">• The maps all need amending to show the alternative on road route Albany Road/Wells Way, consistently across all maps. We object to the maps only showing the route through Burgess Park.</li> <li data-bbox="250 625 1088 762">• FOBP would want to see the alternative route along Albany Road and Wells Way as the alternative to the route crossing the park, being included on all maps – see below.</li> <li data-bbox="250 772 1088 877">• FOBP were informed by Rebecca Towers (Parks Manager in 2015) that the spine would not go through the park following a petition objecting to it 2015.</li> <li data-bbox="250 887 1088 1024">• The EIP Inspectors letter EIP236 and annex indicates that the map EIP 228 should be changed, it says Update Figure 9 (Southwark Cycling Spine diagram) (as a minor modification).</li> </ul> <p data-bbox="206 1066 322 1094">EIP219:</p> <ul data-bbox="250 1139 1088 1318" style="list-style-type: none"> <li data-bbox="250 1139 1088 1244">• On Aylesbury Area Vision Map - Southwark Spine alternative route needs to be included on the map along Albany Road.</li> <li data-bbox="250 1254 1088 1318">• Old Kent Road, Camberwell and Aylesbury Area Vision Maps have inconsistent cycle routes showing.</li> </ul>	<p data-bbox="1128 399 2060 536">Old Kent Road, Elephant and Castle and Camberwell Area Vision Maps have been updated to be consistent and reflect the existing and proposed cycle networks as set out on Southwark Maps, as a factual update.</p>

<b>Representation</b>	<b>Officer Response</b>
<p>Team London Bridge NSPPSV179</p> <p>Key Theme: London Bridge Area Vision and site allocations</p> <ul style="list-style-type: none"> <li>• Content with the extended text relating to growth opportunities in London Bridge Area Vision but could be strengthened by referencing the potential to grow the innovation capacity</li> <li>• Consider that London Bridge should be a major and not district town centre</li> <li>• Welcome inclusion of Area Vision boundaries, BID boundary and Low Line/railway arches in Policies map</li> <li>• NSP49: support 0 residential</li> <li>• NSP50: welcome reference to Melior Street Community Garden</li> <li>• NSP51: St Thomas Street should require ‘retail, community and leisure uses’ not ‘retail, community or leisure’</li> <li>• NSP52: support 0 residential</li> <li>• Railway Arches and Low Line: support strategic target to encourage uses in 800 railway arches but this should refer to providing green jobs</li> </ul>	<p>General support noted.</p> <p>Major Town Centre: London Bridge does not meet the criteria necessary to be classified as a major town centre. It is however in the CAZ and is identified in the London Plan as a CAZ retail cluster.</p> <p>NSP51: providing retail, community or leisure uses provides flexibility for development to come forward and there is a definition in the Glossary.</p> <p>With regards to references to green jobs, this is dealt with under other policies in the Plan and it is not necessary to reiterate.</p>
<p>TfL Commercial Development NSPPSV182</p> <p>Key Theme: Policy SP2 Regeneration that works for all</p> <ul style="list-style-type: none"> <li>• Amendments requested to clause 4 of the policy as it is currently unclear and repetitive.</li> </ul>	<p>Policy SP2 – noted, this is not considered necessary for soundness.</p>

**Representation**

Key theme: Policy P1 social rented and intermediate housing

- Welcome the further clarity that development can provide a mix of different affordable housing tenures, whilst acknowledging that the Mayor’s preferred affordable housing tenures.
- Concern that the requirement in Policy P1 for the removal of viability testing for developments providing 40% policy compliant affordable housing (60% in the Aylesbury Area Action Plan area) undermines our ‘portfolio agreement’ for affordable housing delivery. TfL must deliver at least 50% affordable housing across our portfolio, with a minimum of 35% provided on every site, the affordable housing requirements set out within Policy P1 remain unjustified and put the efficient delivery of affordable housing provisions at risk within the borough.

Key theme: Policy P4 private rented homes

- The 100-unit threshold under Policy P4 deviates from the London Plan, which stipulates a 50-unit threshold for BtR and/or restrict the delivery of sub-100-unit BtR schemes, potentially reducing delivery and discouraging the involvement of smaller developers and builders.
- The London Plan requires a covenant of at least 15 years for Build to Rent developments. The 30 year covenant stipulated in policy P4 may dissuade investment in Build to Rent in Southwark.
- The provision of social rented affordable housing in BtR schemes must be justified. The justification does

**Officer Response**

Policy P1 – noted. Policy P1 sets out a fast track approach of 40% affordable housing and 60% in the Aylesbury Action Area Core. The fast track route provides an incentive for developers to push up their affordable housing provision as they can fast track their application. We have set a higher threshold than the London Plan given our acute need to deliver affordable housing. Most of our planning applications coming forward are meeting 35% affordable housing with the greatest providing 40.5% and therefore we want to ensure we can increase the provision further.

If the fast track route is not being taken, the applicant has the option to follow the viability tested route. The reason for the higher fast track threshold is due to the acute need of affordable housing of 2,077 homes per annum in the borough as identified in the SHMA 2019, therefore this figure is higher than the figure proposed in the London Plan given the local need. This need is set out in the policy. Where a portfolio agreement is in place with the Mayor, this will be considered on a case-by-case basis.

Policy P4 - Policy P4 has been introduced to provide more security than the London Plan which has a threshold of 50 units and only a 15 year covenant. Policy P4 has a threshold of 100 units and a 30 year covenant. Unlike the London Plan, Policy P4 requires social rent equivalent to be provided, however, the London Plan encourages solely Discount Market Rent, preferably London Living Rent. Given the need for social rented units, this is a requirement of Policy P4.

The London Plan at Policy H13 sets out that, Boroughs may set their own local threshold to reflect local housing market circumstances and affordable housing need. Policy P4 has been amended to require 20% intermediate rent at London Living Rent equivalent and

**Representation**

not seem to recognise that low-cost affordable rental products must be managed by a registered provider who more often than not will be a third party. This split management can significantly dilute the management efficiencies on the site which can negatively affect the overall viability of a scheme.

Key theme: Policy P14 residential design

- Concern the drafting has weakened the promotion of higher density development in suitable and sustainable locations.
- Request that an additional criterion is added which requires all development proposals to be designed at the optimum density, taking into account site context and connectivity / accessibility by public transport and other sustainable modes.

Key theme: Policy P16 tall buildings

- support the modifications to the policy including that recognition that tall buildings may be appropriate in “in close proximity to our public transport stations and interchanges.”

Key theme: Policy P30 affordable workspace

- More flexibility should be allowed for in the policy. The policy should conform to the Mayors definition of affordable workspace which has specific social, cultural or economic purpose. The policy could be more flexible by having a sliding scale on the 10% requirement, meaning if more discount was applied to market rents, less floorspace could be required.

**Officer Response**

15% social rent equivalent. Social rent equivalent is required, given the identified need for social housing in Southwark. We do not require social rented equivalent homes to be managed by a registered provider as this is likely to be a small proportion of units and therefore it will be difficult to get a registered provider to manage these properties. The Section 106 agreement will ensure these are delivered at social rent levels and remain in perpetuity.

Policy P14 Residential Design - It is considered that P17 supports higher density development and a further amendment to P14 is unnecessary.

Policy P16 – noted  
Policy P30 - Affordable workspace policy is considered to be sufficiently flexible. Due to need for affordable workspace in the borough we have required 10% on all sites over 500sqm employment floorspace and the discount to market rents is considered on a site by site basis as it may differ by use type or location. The Mayors definition is also included in our definition in the NSP Fact Box for affordable workspace occupier.

NSP26 – the housing capacity has stayed as an indicative capacity due to the requirement for housing being a “should” rather than “must” requirement, which is consistent with the rest of the plan. The indicative capacity is considered to be sufficiently flexible. Planning application proposals for an increased residential provision would need to meet all the policy requirements of the plan.

Representation	Officer Response
<p>Key theme: NSP26 Abellio Walworth depot and NSP71 Aylesham Centre</p> <ul style="list-style-type: none"> <li>Support mixed use development to include housing over bus garages. The indicative capacity of NSP26 at 196 units is considered to be too low based on early feasibility studies and this should be reflected as a minimum capacity.</li> </ul>	
<p>The Coal Authority No comments</p>	N/A
<p>The Planning Lab on behalf of trustees of Tate Gallery NSPPSV412</p> <p>Key Theme: NSP55 (Mandela Way) The NSP and the OKR AAP are not consistent on the following points:</p> <ol style="list-style-type: none"> <li>The NSP modifications amend the requirement for 'community uses' (as in latest draft OKRAAP) to 'leisure, arts, culture or community uses'.</li> <li>The NSP modifications do not include the requirement for a new primary school, which is specified in the latest draft OKRAAP.</li> <li>The NSP modifications do not mention of the option of relocating Tesco from its existing site onto Mandela Way, as per the latest draft of the OKRAAP.</li> <li>Object to the site diagram showing the indicative new park location which would affect existing access routes and future development potential of the Tate warehouse site. As a charitable entity the development potential is not for commercial profit.</li> </ol>	<p>On OKR AAP inconsistencies - Point 1 – this is to bring more clarity to the use classes following the changes to the use classes order in 2020 and there is a definition in the glossary. Point 2 – the site methodology paper allows for education uses if this is necessary for the site. Further clarification will be in the OKR AAP. Point 3 – this is further detail which is provided in the AAP and does not also need to be in the NSP as it provides different masterplan options but does not change the overall land uses required.</p> <p>The AAP considers potential uses as part of site requirements with more detail.</p>

Representation	Officer Response
<p>5. Notes the requirement in the NSP for industrial uses however it does not specify where in the site these are required, and flexibility is sought for the Tate warehouse site. The Tate object to the identification of this part of the site in the Old Kent Road AAP as a standalone industrial site.</p>	
<p>Residents of Brideale Close Traveller Site</p> <p><b>Key theme:</b> P11 Gypsy and Traveller accommodation</p> <ul style="list-style-type: none"> <li>• Reintroduce 'subject to need' to be in line with Southwark counsel advice, to align with NPPF, to reflect desire of residents to relocate to bricks and mortar and to not conflict with Southwark's previous provision to offer tenants its G+T sites as Right to Buy.</li> <li>• the revised version of P11 represents no change over SP9 in the adopted Southwark Core Strategy (2011) and therefore the IIA should have 'neutral change'.</li> <li>• Monitoring Indicators are unsound and provides no indication of how P11 performs against the strategic objectives</li> <li>• Remove references to GLA London wide review as no details provided by Mayor yet</li> </ul>	<p>'Subject to need' was removed at the request of the Inspectors at the Hearings to ensure all four sites are safeguarded for the use of culturally appropriate accommodation.</p> <p>The IIA and P11 reflect updated national policy 'Planning Policy for Traveller Sites (PPTS)' where the definition for gypsies and travellers for the purposes of planning was updated. This Core Strategy pre-dates the PPTS and therefore there has been a change to the policy which is reflected in the IIA.</p> <p>The Monitoring Indicators aim to monitor the number of sites, number of pitches and number of unauthorized encampments. These are necessary to monitor to ensure the effectiveness of the policy.</p> <p>Para 4.14.2 of the London Plan sets out the Mayor's intention to carry out a London-wide assessment. The council intends to be involved in this assessment once it is commenced by the Mayor.</p>

Representation	Officer Response
<ul style="list-style-type: none"> <li>Review whether Southwark has the legal competence to commit to delivering 'culturally appropriate' accommodation given the proposed London Plan definition was revoked and Brideale residents want to move to bricks and mortar.</li> </ul>	<p>While the London Plan and PPTS do not require local plans to provide culturally appropriate accommodation, Southwark will safeguard our existing sites and aim to provide culturally appropriate accommodation where possible.</p>
<p>Thomas Ulicsak, Burgess Sports</p> <p>Key Theme: Southwark Spine</p> <ul style="list-style-type: none"> <li>The Southwark Spine modification is not positively prepared, justified or effective. The "Burgess Park" cycle way really should use the surrounding roads rather than cutting up the park.</li> </ul>	<p>The Cycle Strategy 2015 provided an indicative and illustrative map for the Southwark Spine that allows the route to be updated and developed "wherever possible". This allows the council to respond to new opportunities, for example from new developments.</p>
<p>Tom Clarke on behalf of Theatres Trust NSPPSV189</p> <p>Key Theme: P44 - P54</p> <ul style="list-style-type: none"> <li>The Trust supports the proposed modifications, which strengthen the policy for the purposes of protecting existing facilities including theatres and providing new ones.</li> </ul>	<p>Support noted.</p>
<p>Individual Tracey Beresford</p> <p>Key Theme: Southwark Spine</p> <ul style="list-style-type: none"> <li>The Southwark Spine modification is not positively prepared, justified or effective. Route should be through Wells Road instead of Burgess Park</li> </ul>	<p>The Cycle Strategy 2015 provided an indicative and illustrative map for the Southwark Spine that allows the route to be updated and developed "wherever possible". This allows the council to respond to new opportunities, for example from new developments.</p>

<b>Representation</b>	<b>Officer Response</b>
<p>Turley on behalf of Watkin Jones</p> <p>Key theme: Policy P5 student homes</p> <ul style="list-style-type: none"> <li>• Support the requirement for 5% student rooms easily adaptable for occupation by wheelchair users.</li> <li>• Support the focus on the provision of affordable student rooms in accordance with the affordable student rents defined by the Mayor of London on student rooms for nominated further and higher education institutions, through the removal of the requirement to provide conventional affordable housing in this route. This is considered to comply more closely with the London Plan.</li> <li>• Support the retention of securing affordable conventional housing on direct-let student schemes “as a first priority”.</li> <li>• Welcome the inclusion of a viability assessment to determine the maximum but note the direct let removes the fast track option set out in the London Plan.</li> </ul>	<p>Policy P5 student homes – noted.</p>
<p>Turley on behalf of Alumno Group NSPPSV09</p> <p>Key theme: NSP76 St Olav’s Business Park</p> <ul style="list-style-type: none"> <li>• Generally support the thrust of the site allocation and related policies</li> <li>• Support the amendment to update Use Classes to reflect national legislation</li> <li>• Request that the proposed modification to include the wording “at least the amount of employment floorspace currently on site” in relation to employment reprovision is removed, and wording added to clarify that appropriate employment floorspace levels are to be determined as part of the development management process</li> </ul>	<p>NSP 76 St Olav's – The site currently contains 4,550sqm employment floorspace and the policy approach is to ensure this is replaced in order to maintain the borough’s supply of employment floorspace on key site allocations. Additionally the indicative residential capacity is 125 homes. With regards to other residential uses, the requirement for student homes is not set out within the NSP, there is a significant need for housing and affordable housing in the borough, therefore this is a priority. The provision of student homes on site allocations will be considered on a case by case basis.</p>

Representation	Officer Response
<ul style="list-style-type: none"> <li>Support the modification wording ‘indicative’ in relation to residential capacity on this site and request that this wording is amended to reflect that this indicative capacity relates to any form of residential accommodation which would encompass a wider range of uses, such as student accommodation.</li> </ul> <p>Key theme: Policy P5 student homes</p> <ul style="list-style-type: none"> <li>Support the requirement for 5% student rooms easily adaptable for occupation by wheelchair users.</li> <li>Support the focus on the provision of affordable student rooms in accordance with the affordable student rents defined by the Mayor of London on student rooms for nominated further and higher education institutions, through the removal of the requirement to provide conventional affordable housing in this route. This is considered to comply more closely with the London Plan.</li> <li>Support the retention of securing affordable conventional housing on direct-let student schemes “as a first priority”.</li> <li>Welcome the inclusion of a viability assessment to determine the maximum but note the direct let removes the fast track option set out in the London Plan.</li> </ul>	<p>Policy P5 student homes – noted.</p>
<p>WSP on behalf of Apex Capital Partners NSPPSV474</p> <p>Key theme: NSP64 (Marlborough Grove and St James’s Road)</p> <ul style="list-style-type: none"> <li>Support the inclusion of 310-330 St James’s Road within the draft site allocation Policy NSP64: Marlborough Grove and St James’s Road. The wording of Policy NSP64 note the</li> </ul>	<p>Planning application reference and housing trajectory – this is noted and will be updated when the 5 and 15 Year Housing Land Supply is updated.</p>

**Representation**

live planning application 21/AP/1667 relevant to this site, in order to be considered 'sound.'

- 330 St James's Road has been removed as a 'Building of Townscape Merit' within the draft policy allocation. The policy allocation diagram within the New Southwark Plan needs to be updated to reflect this change, for effectiveness.
- It notes that the Housing Trajectory should be updated to include reference to planning application 21/AP/1667 providing 153 homes which was submitted in May 2021 after the last update.

**Officer Response**

Regarding 330 St James's Road being removed as a 'Building of Townscape Merit' within the draft policy allocation, the site allocation map that accompanies the NSP site allocation (August 2020 version) is correct in identifying the buildings of townscape merit in the centre of the site. However the building numbers listed in the accompanying text did not reflect this. The factual update made to the plan to reflect the correct building addresses is set out below:

The site contains buildings of townscape merit (~~the old varnish and Japan factory at 328-324 at 330-334~~ St James's Road including the old varnish and "Japan" factory and the 1930s Chevron office buildings (now in residential use) at 294-304 St James's Road) and buildings of architectural and historic interest (the Georgian terrace adjacent to the new "Bath House" at 541-553 Old Kent Road).

## **Appendix 3 Email Notification**

You are receiving this email because you have previously made a comment on the New Southwark Plan.

## Southwark Council is consulting on the **Proposed Main Modifications to the New Southwark Plan**

Consultation is **now** open until **Friday 24<sup>th</sup> September 2021** to provide comments.

### **Proposed Main Modifications to the Submitted New Southwark Plan**

#### **What is the New Southwark Plan?**

The New Southwark Plan (NSP) is a statutory planning document that will provide an overarching strategy for managing growth and development across the borough for the next 15 years.

#### **Why are we consulting?**

The NSP was submitted to the Planning Inspectorate for Examination in January 2020. The public hearings took place virtually from February to April 2021. Following these hearings, the Council has worked with the Inspectors to propose a number of main modifications to the Plan. These modifications are what we seek comments on now.

#### **Main Modifications and Additional Modifications**

“Main modifications” are material changes to the submitted Plan which are necessary to make it sound and legally compliant. “Additional modifications” (minor modifications) are proposed non-consequential amendments to the Plan not necessary for soundness. This consultation is seeking comments only relating to the main modifications however additional modifications are also published on our website.

#### **Where can I view the documents?**

All the documents relating to the New Southwark Plan and the Examination are available on our Examination [website](#).

The New Southwark Plan Main Modifications, appendices and supporting documents are available [here](#).

#### **How can I comment?**

As with the previous consultations, at this stage we are required to ask whether the Plan is legal and meets the “Tests of Soundness”. More information can be found on our website.

At this stage comments can only be made on the proposed Main Modifications to the draft Plan, not the full draft Plan as submitted. When submitting your comments, please make clear which Main Modification(s) you are commenting on.

- Visit our [Consultation Hub](#) to fill out an online questionnaire
- Email your comments to [planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk)

- You can also write to:
- Planning Policy  
Southwark Council  
PO BOX 64529  
London  
SE1P 5LX

Telephone 020 7525 5403 for any queries about how to comment

The consultation will be open until **23:59 on Friday 24 September 2021**.

### **What will happen after this consultation?**

All comments will be made public and will be submitted to the Inspectors following this consultation. The Inspectors will then consider the responses and prepare a report for the council around Autumn 2021. The final New Southwark Plan will then be adopted by the council. This is a decision taken by all councillors at Council Assembly.

## **Appendix 4 Press Notice**

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

NOTICE OF CONSULTATION FOR:

PROPOSED MAIN MODIFICATIONS FOR THE NEW  
SOUTHWARK PLAN (REGULATION 20)

The Council is consulting on the Proposed Main Modifications for the New Southwark Plan from 6 August to 24 September 2021.

The New Southwark Plan sets out the overarching planning and development strategy for the whole borough up to 2036. The Examination in Public took place from 23 February – 30 April 2021. Following the public hearings, the council has worked with the Inspectors to propose a number of main modifications to the Plan. These modifications are what we seek comments on now. All duly made representations on the proposed main modifications will be considered by the Inspectors who will then prepare a report for the council.

This consultation asks two specific questions which will give you an opportunity to comment on how the New Southwark Plan has been prepared, that its aims are achievable and that the plan is based on a robust evidence base. These questions are more commonly known as the 'Test of Soundness'. Considerations for this consultation:

1. Is the Local Plan Legal?
2. Is the Local Plan 'Sound'?

These are the same questions the independent Planning Inspectors asked at the Examination in Public. Following the consultation, the modifications will be reviewed again by the Inspectors and a recommendation will be given on whether the New Southwark Plan should be adopted.

The Proposed Main Modifications for the New Southwark Plan and supporting documents can also be viewed online at the following location:

<https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/new-southwark-plan?chapter=9>

At this stage comments can only be made on the proposed Main Modifications to the draft Plan, not the full draft Plan as submitted. When submitting your comments, please make clear which Main Modification(s) you are commenting on.

How to comment:

- Visit our Consultation Hub to fill out an online questionnaire at <https://consultations.southwark.gov.uk/corporate-strategy/new-southwark-plan-main-modifications>
- Email your comments to [planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk)
- Write to: Planning Policy, Southwark Council, PO BOX 64529, London, SE1P 5LX
- Telephone 020 7525 5403 for any queries about how to comment

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All comments must be received by Friday 24 September 2021 23:59.

Register for a My Southwark account and opt-in to our planning policy email updates on your profile at <https://www.southwark.gov.uk/mysouthwark>

## **Appendix 5 social media update**

## Example of social media update on Twitter



## **Appendix 6 consultation Hub questions**

# New Southwark Plan Proposed Main Modifications 2021

The New Southwark Plan (NSP) is the Local Plan for Southwark. It provides the overarching strategy for managing growth and development across the borough for the next 15 years.

Not only does it set out planning policies that will be used to make decisions on planning applications, it also explains how development will be delivered and it may also inform future decisions about investment in infrastructure. The final NSP will replace the saved policies of the Southwark Plan 2007, the Core Strategy 2011, the Aylesbury Area Action Plan 2010, the Peckham and Nunhead Area Action Plan 2014 and the Canada Water Area Action Plan 2015.

## What is happening now?

Following the public hearings which took place from March to April 2021, we have proposed a number of changes to the plan that are called Main Modifications. These have been agreed by the Planning Inspectors and will now undergo a further stage of public consultation. These modifications are what we seek comments on now. All comments on the proposed main modifications will be considered by the Planning Inspectors.

These Main Modifications are set out in the document called 'EIP219 Main Modifications to the New Southwark Plan'.

It is supported by:

- EIP220 Schedule of Changes to the Policies Map
- EIP224 Updated Integrated Impact Assessment (July 2021)
- EIP225 Updated Equalities Impact Assessment (June 2021)
- EIP238 Additional Modifications to the New Southwark Plan
- EIP239 Consultation Plan

The documents can be viewed on the [Main Modifications page](#) of our website. All of the supporting documents, evidence base and examination documents that have been submitted to the Planning Inspectorate can be found on our [Examination webpages](#).

At this stage comments can only be made on the proposed Main Modifications to the draft Plan, not the full draft Plan as submitted.

## **Main Modifications and Additional Modifications**

“Main modifications” are material changes to the submitted Plan which are necessary to make it sound and legally compliant. Main modifications can only be recommended by Inspectors at the request of the Local Planning Authority. The council asked the Inspectors under section 20(7C) of the 2004 Planning and Compulsory Purchase Act as amended) to recommend ‘main modifications’ (changes that materially affect the policies) to make a submitted local plan sound and legally compliant on 21 May 2021 (EIP233). The Inspector’s wrote a Post-Hearings Letter to the Council on 28 May 2021 (EIP236).

“Additional modifications” (minor modifications) are proposed non-consequential amendments to the Plan not necessary for soundness. These generally involve changes that enhance the clarity of the plan without materially affecting the implementation of plan policies and to provide factual updates. The examination does not concern itself with ‘additional modifications’ and these changes are a matter for the Council to make to its plan. It can be beneficial, however, if when consulting on proposed main modifications, the Council also publishes a schedule of its additional modifications for completeness. Additional Modifications have been published at the same time as this consultation.

**Please note: this consultation is seeking comments only relating to the main modifications. Additional modifications are only included for completeness.**

Consultation on the Main Modifications to the New Southwark Plan will run from **6 August 2021 to 24 September 2021 (11.59pm)**.

### **How to comment**

As with the previous consultations, at this stage we are required to ask whether the Plan is legal and meets the “Tests of Soundness”. More information can be found on our website.

#### **1. Is the Local Plan Legal?**

A plan is considered legal when it complies with section 20(5) (a) of the Planning and Compulsory Purchase Act 2004.

You may wish to consider the following before making a representation on legal compliance:

- Whether the Local Plan has regard to national policy and guidance issued by the Secretary of State
- Whether the Local Plan has been prepared in-line with our Local Development Scheme (LDS)
- Whether community consultation has been carried out in accordance with our adopted Statement of Community Involvement
- Whether an Integrated Impact Assessment assessing social, environmental and economic factors has been prepared and made public.
- Whether the requirements of the Duty to Co-operate have been met. The Localism Act, section 110, and the National Planning Policy Framework, paragraphs 24 to 27, creates a duty on all local planning authorities and other bodies to cooperate with each other to address strategic issues in the preparation of the Local Plan

## 2. Is the Local Plan 'Sound'?

As part of the examination, the independent Planning Inspector is required to consider if the New Southwark Plan has been positively prepared, justified, effective, and is consistent with national policy.

You may wish to consider the following before making a representation on the Soundness of our plan:

- **Positively Prepared:** This means that we have objectively assessed the need for homes, jobs, services and infrastructure and these have been delivered sustainably. If you think that our assessments are not objective or do not take sufficient account of unmet needs in neighbouring authorities then your comments relate to whether our Local Plan has been positively prepared or not.
- **Justified:** This means that the Plan is based upon a robust and credible evidence base. If you think that the evidence doesn't support the choice made in our Local Plan or there are realistic alternatives then your comments relate to whether it is justified.
- **Effective:** This means that the Plan is achievable. If you think that what we are proposing in the Local Plan will not happen as the required infrastructure cannot be provided, the groups who will deliver elements of it haven't signed up to it or our Local Plan does not join up with the strategies of our neighbouring authorities, then your comments relate to whether our Local Plan is effective or not.
- **Consistent with national policy:** Do you consider that our Local Plan accords with the National Planning Policy Framework, the London Plan, other policies or includes clear and convincing reasons for doing something different? Alternatively, you may think that the Local Plan should depart from national policy due to an identified and justified local need.

## How will comments be taken into account?

The outcomes of the New Southwark Plan Main Modifications consultation will be uploaded to the Council's examination webpage. All representations will be submitted to the Inspectors as part of the Examination. Following the Inspectors review, a final report will be published from the Inspectors, taking into account consultation responses received to the Main Modifications.

**To contact us:**

Email: [planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk)

or call either: 020 7525 5403

You can also write to:

Planning Policy  
Southwark Council  
PO BOX 64529  
London  
SE1P 5LX

## Privacy Statement

Southwark Council uses your personal data to record your response to the survey. Section 1 of the Localism Act 2011 allows us to do this. The council does not require your permission to process your data and failure to tell us your information may mean that we are unable to process your response. Your personal information will only be used by our planning team and will be destroyed after four years. If you are concerned about how the council uses your personal data or would like to enquire about the personal information we hold on you, please contact us via [dpo@southwark.gov.uk](mailto:dpo@southwark.gov.uk) or on 020 7525 5000. More information about your rights is available on our website, or via the Information Commissioner ([www.ico.org.uk](http://www.ico.org.uk)).

What is your name?

Would you like to be kept informed of the progress of the New Southwark Plan?

If you select yes, please provide your email address or postal address

Yes

No

What is your email address?

What is your organisation?

What is your address and postcode?

Please print this page as many times as modifications you would like to make a comment on.

Which Main Modification would you like to make a comment on?

Please provide your comment in the text box below

## Equalities questions

### Completing this section is optional.

To make sure we are providing fair services to all of Southwark's diverse communities, it is important that we ask you a few questions about yourself. You are under no obligation to provide the information requested, but it would help us greatly if you did. The information will be used to help us plan services that meet the needs of all users. Your responses will be kept confidential and any information published will be made anonymous. The information will be used in a statistical format only.

#### Age

*Please select only one item*

- Under 16    16 - 17    18 - 24    25 - 34    35 - 44    45 - 54    55 - 64  
 65 - 74    75 - 84    85 - 94    95+

What do you consider to be your ethnic background?

*Please select only one item*

- White British    White Irish    White English    White Scottish    White Welsh  
 White Northern Irish    Other European    Other White (please specify if you wish)  
 Black British    Black Caribbean    Nigerian    Ghanaian    Sierra Leonean  
 Somali    Other African    Other Black (please specify if you wish)  
 Asian British    Indian    Bengali    Chinese    Pakistani    Vietnamese  
 Filipino    Any other Asian (please specify if you wish)  
 Mixed white/Black Caribbean    Mixed White Black African    Mixed White/Asian  
 Other Mixed background (please specify if you wish)    Latin American  
 Gypsy, Roma or Irish Traveller    Other ethnic background (please specify if you wish)

Please specify further if you wish:

Are you disabled?

*Please select only one item*

- Yes    No    Prefer not to say

Please tick the box or boxes below that best describe the nature of your impairment(s):

Please select all that apply

- Hearing / Vision (e.g. deaf, partially deaf or hard of hearing; blind or partial sight)
- Physical / Mobility (e.g. wheelchair user, arthritis, multiple sclerosis etc.)
- Mental health (lasting more than a year. e.g. severe depression, schizophrenia etc.)
- Learning disability (e.g. dyslexia, dyspraxia etc.)
- 

Long-term illness or health condition (e.g. Cancer, HIV, Diabetes, Chronic Heart disease, Rheumatoid Arthritis, Chronic Asthma)

- Other  Prefer not to say

What is your sex as recorded at birth?

Please select only one item

- Male  Female  Other (please specify if you wish)  Prefer not to say

Please specify further if you wish

Is your Gender Identity the same as the sex you were recorded at birth?

Please select only one item

- Yes  No  Prefer not to say

If no, how would you define your gender? Please specify if you wish

What is your sexual orientation

Please select only one item

- Heterosexual/straight  Lesbian/Gay woman  Gay man  Bi-sexual  
 Other (please specify if you wish)  Prefer not to say

Please specify further if you wish

What is your religion or belief?

Please select only one item

- Christian  Sikh  Hindu  Muslim  Jewish  Buddhist  
 No religion  Other (please specify if you wish)

Please specify further if you wish